

Exhibit 1

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

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<p>Page 1</p> <p>1 J11353479 eb</p> <p>2</p> <p>3 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA</p> <p>4</p> <p>5 SMARTMATIC USA CORP., * SMARTMATIC *</p> <p>6 INTERNATIONAL HOLDING * B.V., AND SGO *</p> <p>7 CORPORATION LIMITED * *</p> <p>8 VS. * CASE NO. 22-cv-0098-WMW-JFD *</p> <p>9 MICHAEL J. LINDELL * AND MY PILLOW, INC. *</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14 VIDEOTAPED DEPOSITION OF MICHAEL JAMES LINDELL</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19 Date Edith A. Boggs, CSR</p> <p>20</p> <p>21 6-11-2024 HOUSTON, TEXAS</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 3</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3</p> <p>4 ATTORNEYS FOR PLAINTIFFS:</p> <p>5 Benesch Friedlander Coplan & Aronoff 71 South Wacker Drive, Suite 1600 Chicago, Illinois 60606</p> <p>6</p> <p>7 By: Nicole Wrigley, Esq. and Julie Loftus, Esq.</p> <p>8</p> <p>9</p> <p>10 ATTORNEY FOR DEFENDANTS:</p> <p>11 McSweeney Cynkar & Kachouroff, PLLC 13649 Office Place, Suite 101 Woodbridge, Virginia 22192</p> <p>12</p> <p>13 By: Christopher Kachouroff, Esq.</p> <p>14</p> <p>15 ALSO PRESENT:</p> <p>16 Ms. Avery Suarez, Videographer</p> <p>17</p> <p>18 REPORTED BY:</p> <p>19 Ms. Edith A. Boggs</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p style="text-align: right;">Page 9</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Good morning. We are</p> <p>3 now on the record. Today's date is June 11th, 2024, and</p> <p>4 the current time is 9:00 a.m. This begins the</p> <p>5 videotaped deposition of Mike Lindell.</p> <p>6 Counsel, will you please introduce</p> <p>7 yourselves, and the witness will be sworn.</p> <p>8 MS. WRIGLEY: Yes. Nicole Wrigley for the</p> <p>9 Smartmatic plaintiffs.</p> <p>10 MS. LOFTUS: Julie Loftus also for the</p> <p>11 Smartmatic plaintiffs.</p> <p>12 MR. KACHOUROFF: Chris Kachouroff for</p> <p>13 the -- counsel for both Mr. Lindell and MyPillow.</p> <p>14 THE WITNESS: Michael James Lindell.</p> <p>15 MICHAEL JAMES LINDELL</p> <p>16 was called as a witness and, being first duly sworn by</p> <p>17 the notary, testified as follows:</p> <p>18 EXAMINATION</p> <p>19 Q. (BY MS. WRIGLEY) Good morning. Please state</p> <p>20 and spell your full name for the record.</p> <p>21 A. Michael James Lindell, M-I-C-H-A-E-L,</p> <p>22 J-A-M-E-S, L-I-N-D-E-L-L.</p> <p>23 Q. What is your home address, Mr. Lindell?</p> <p>24 A. I don't know. I just got a new place last</p> <p>25 year. You can use 1550 Audubon Road, Chaska, Minnesota</p>	<p style="text-align: right;">Page 11</p> <p>1 recorded by a court reporter here?</p> <p>2 A. Yes.</p> <p>3 Q. Do you understand your testimony is being</p> <p>4 videotaped today?</p> <p>5 A. Yes.</p> <p>6 Q. Do you understand your testimony can be shown</p> <p>7 to a jury in this case?</p> <p>8 A. Yes.</p> <p>9 Q. Do you understand --</p> <p>10 MR. KACHOUROFF: I'm going to object. This</p> <p>11 wasn't designated for trial. If this is a trial</p> <p>12 deposition, I'll be doing a lot of objecting.</p> <p>13 MS. WRIGLEY: Since it's a federal case,</p> <p>14 there is no discovery or evidence depositions, it's</p> <p>15 just --</p> <p>16 MR. KACHOUROFF: Actually, Rule 30 and</p> <p>17 Rule 45 talks about it.</p> <p>18 MS. WRIGLEY: What rule are you citing to?</p> <p>19 MR. KACHOUROFF: Rule 30 and Rule 45 of</p> <p>20 the --</p> <p>21 MS. WRIGLEY: Yes.</p> <p>22 MR. KACHOUROFF: -- Federal Rules of Civil</p> <p>23 Procedure.</p> <p>24 MS. WRIGLEY: Yes, indeed, but there is no</p> <p>25 distinction between a discovery or a trial deposition.</p>
<p style="text-align: right;">Page 10</p> <p>1 55318.</p> <p>2 Q. Do you have any other residences besides the</p> <p>3 one you just identified?</p> <p>4 A. No. That's my corporate office. My residence</p> <p>5 I have is my only residence in Texas.</p> <p>6 Q. And where in Texas is that residence?</p> <p>7 A. It's in Lufkin, Texas.</p> <p>8 Q. Are you --</p> <p>9 A. I don't know the physical address.</p> <p>10 Q. Are you currently residing in Texas,</p> <p>11 Mr. Lindell?</p> <p>12 A. Yes. And I'm not -- I'd rather even not put</p> <p>13 that address on public record because, as you know, you</p> <p>14 guys leak stuff out of depositions, and I don't want</p> <p>15 people knocking on my door.</p> <p>16 MS. WRIGLEY: I'm going to move to strike</p> <p>17 as nonresponsive everything after "yes."</p> <p>18 Q. (BY MS. WRIGLEY) Mr. Lindell, do you</p> <p>19 understand that you're providing testimony today under</p> <p>20 oath?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand that you have to tell the</p> <p>23 truth no matter what?</p> <p>24 A. Yes.</p> <p>25 Q. Do you understand your testimony is being</p>	<p style="text-align: right;">Page 12</p> <p>1 MR. KACHOUROFF: Okay. Well, I'll be</p> <p>2 making a lot of objections then.</p> <p>3 MS. WRIGLEY: That's fine. That's fine.</p> <p>4 Q. (BY MS. WRIGLEY) Okay. Do you understand that</p> <p>5 your testimony can be shown to a jury in this case,</p> <p>6 Mr. Lindell?</p> <p>7 A. Yes.</p> <p>8 Q. Do you understand your testimony can be shown</p> <p>9 to the judge in this case?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know of any reason that would prevent</p> <p>12 you from providing accurate testimony here today?</p> <p>13 A. No.</p> <p>14 Q. Before we get started, I want to go over some</p> <p>15 rules and protocols on the record for this deposition.</p> <p>16 You have been deposed a number of times, correct?</p> <p>17 A. Yes.</p> <p>18 Q. How many times, sir?</p> <p>19 A. I don't know. Two, three. I have no idea.</p> <p>20 Q. When was the last time you were deposed?</p> <p>21 A. A year ago.</p> <p>22 Q. In what case?</p> <p>23 A. In the Eric Coomer.</p> <p>24 Q. And you've not been deposed since then, sir?</p> <p>25 A. Huh-uh.</p>

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<p style="text-align: right;">Page 13</p> <p>1 Q. Okay.</p> <p>2 A. No.</p> <p>3 Q. Since you've been deposed, you may be familiar</p> <p>4 with these, but I'll go over them just in case, a few</p> <p>5 ground rules.</p> <p>6 We have a court reporter to my right here</p> <p>7 taking down my questions and your answers, and so it's</p> <p>8 really important that we avoid talking over each other</p> <p>9 or interrupting. It's bound to happen. We're human</p> <p>10 beings. But it makes her job much easier and it will</p> <p>11 make the transcript accurate if we can just try to avoid</p> <p>12 talking over each other. Is that fair?</p> <p>13 A. You have a big advantage because I lost my</p> <p>14 voice.</p> <p>15 Q. Okay.</p> <p>16 A. You must have prayed for that.</p> <p>17 Q. And do you agree, sir?</p> <p>18 A. Uh-huh. Yes.</p> <p>19 Q. Okay. Do you understand that all of your</p> <p>20 answers have to be verbal today as opposed to nodding</p> <p>21 your head?</p> <p>22 A. Yes.</p> <p>23 Q. During my examination, your counsel, who he --</p> <p>24 which he's just referenced, may object to one of my</p> <p>25 questions.</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. Which political office have you considered</p> <p>2 running for?</p> <p>3 A. It must have been 2000 and -- it was the</p> <p>4 governor of Minnesota, and it was just a -- I was</p> <p>5 pondering it.</p> <p>6 Q. In 2019, were you considering a run for</p> <p>7 political office such as the governor of Minnesota?</p> <p>8 A. No, it was 2020 -- after 2020. It was right</p> <p>9 before the election, I thought maybe the next one, I</p> <p>10 would run for governor.</p> <p>11 Q. So in 2020, you were considering potentially</p> <p>12 making a run to be the governor of Minnesota?</p> <p>13 A. As I mentioned.</p> <p>14 Q. Have you ever considered running for president</p> <p>15 of the United States, sir?</p> <p>16 A. No.</p> <p>17 Q. I'm going to show you the first exhibit or</p> <p>18 document today. Bear with me. There's a process.</p> <p>19 (Exhibit 586 marked.)</p> <p>20 Q. (BY MS. WRIGLEY) Mr. Lindell, I'm handing to</p> <p>21 you what's been marked as Exhibit 586.</p> <p>22 Just for the record, this is an excerpt</p> <p>23 from a text chain that was produced by defendants in</p> <p>24 this case. The Bates number for the full text chain is</p> <p>25 DEF 121483. This particular text chain as produced was</p>
<p style="text-align: right;">Page 14</p> <p>1 A. Right.</p> <p>2 Q. Do you understand you are required to answer my</p> <p>3 question after your counsel objects unless he instructs</p> <p>4 you not to answer?</p> <p>5 A. Yes.</p> <p>6 Q. Similar with us interrupting each other, if</p> <p>7 your counsel objects, I'll just ask if you give him a</p> <p>8 minute for him to object, put it on the record before</p> <p>9 you begin answering, so we can avoid crosstalk. Is that</p> <p>10 fair?</p> <p>11 A. Yes.</p> <p>12 Q. If I ask you a question and you don't</p> <p>13 understand it, just let me know. Otherwise, I'll assume</p> <p>14 you understood the question and were able to answer. Is</p> <p>15 that fair?</p> <p>16 A. Yes.</p> <p>17 Q. And if at any point in time -- we talked about</p> <p>18 this earlier -- you need to take a break, just let me</p> <p>19 know. I'd just ask if there's a question pending, you</p> <p>20 answer the question, and we can break if you need a</p> <p>21 minute off the record. Is that fair?</p> <p>22 A. Yes.</p> <p>23 Q. Mr. Lindell, have you ever considered running</p> <p>24 for political office?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 16</p> <p>1 149 pages. Just so it's clear for the record, this is</p> <p>2 an excerpt of selected pages only.</p> <p>3 If you look at the bottom right-hand corner</p> <p>4 on the first page, sir --</p> <p>5 A. Yeah.</p> <p>6 Q. -- you can see after the decimal point, it says</p> <p>7 Page 1.</p> <p>8 A. Uh-huh.</p> <p>9 Q. And then if you flip to the other pages, that</p> <p>10 number after the decimal point will indicate what</p> <p>11 pages --</p> <p>12 A. I got it.</p> <p>13 Q. -- were excerpted from the document.</p> <p>14 A. I got it.</p> <p>15 Q. Okay.</p> <p>16 MR. KACHOUROFF: I'm going to have an</p> <p>17 objection to completeness.</p> <p>18 MS. WRIGLEY: That's fine. Thank you.</p> <p>19 Q. (BY MS. WRIGLEY) At the top, do you see there</p> <p>20 are a number of names written with respect to this text</p> <p>21 message?</p> <p>22 A. Yes.</p> <p>23 Q. One of those names is yourself, correct?</p> <p>24 A. Jim Furlong and Mike Lindell.</p> <p>25 Q. Do you recognize that to be yourself and your</p>

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<p style="text-align: right;">Page 17</p> <p>1 phone number?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay. And who is Jim Furlong?</p> <p>4 A. Jim Furlong, he's been with me a long time.</p> <p>5 He's on the board of MyPillow. He's a friend of mine.</p> <p>6 We go back to 20-some years.</p> <p>7 Q. At one point, Mr. Furlong was a member of</p> <p>8 MyPillow's board of directors?</p> <p>9 A. Yeah.</p> <p>10 Q. During what period of time?</p> <p>11 A. I don't know. Maybe 2011 or '12 to present.</p> <p>12 Q. And Mr. Furlong is a friend of yours, sir?</p> <p>13 A. He -- became friends. We -- I met him when</p> <p>14 he -- I started MyPillow, and we were professional card</p> <p>15 counters before that. I met him the year 2000.</p> <p>16 Q. I'm going to direct your attention to some</p> <p>17 information in this text chain between you and</p> <p>18 Mr. Furlong.</p> <p>19 A. Correct.</p> <p>20 Q. If you go back to Page 11, do you see there's a</p> <p>21 date in the middle of the top?</p> <p>22 A. Yes.</p> <p>23 Q. January 19, 2016, correct?</p> <p>24 A. That's correct.</p> <p>25 Q. Do you see that on the left are messages from</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. And then he says, "Red alert," right?</p> <p>2 A. "Red alert" is a different text.</p> <p>3 Q. Yes. On the next day?</p> <p>4 A. Right. Yeah, "red alert" has --</p> <p>5 Q. Okay.</p> <p>6 A. -- nothing to do with that.</p> <p>7 Q. Nothing --</p> <p>8 A. We were talking about Costco. We were talking</p> <p>9 about Costco. This is stuff in between in our text,</p> <p>10 sarcasm.</p> <p>11 Q. Okay.</p> <p>12 A. Believe me, Jim Furlong would never vote for</p> <p>13 me.</p> <p>14 Q. I'm going to direct your attention to another</p> <p>15 portion of this text, sir. If you could go to Page 13,</p> <p>16 please.</p> <p>17 A. Okay.</p> <p>18 Q. And actually, if you look on -- I'll have you</p> <p>19 go to 12 instead. There's a date at the bottom that</p> <p>20 will identify the date from this text chain.</p> <p>21 Do you see it's February 6, 2016, at the</p> <p>22 bottom of Page 12?</p> <p>23 MR. KACHOUROFF: You're on 13, Mike.</p> <p>24 A. Okay.</p> <p>25 Q. (BY MS. WRIGLEY) Do you see at the bottom of</p>
<p style="text-align: right;">Page 18</p> <p>1 Mr. Furlong?</p> <p>2 A. Yes.</p> <p>3 Q. And then do you see on the right, those are</p> <p>4 messages from yourself?</p> <p>5 A. Yes.</p> <p>6 Q. On that date, Mr. Furlong says, "Call me when</p> <p>7 you can." Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. And you responded, "If I run with Trump...can</p> <p>10 we count on your vote?" Correct?</p> <p>11 A. That's correct.</p> <p>12 Q. Okay.</p> <p>13 A. I said that because Jim Furlong is a raging</p> <p>14 left Democratic, and him and I argued over Bush and</p> <p>15 stuff all the time. So that was very much sarcasm.</p> <p>16 Q. You were trying to antagonize Mr. Furlong?</p> <p>17 A. Yes.</p> <p>18 Q. And he responded the next day on January 20th,</p> <p>19 2016, correct?</p> <p>20 A. What's that?</p> <p>21 Q. He responded the next day to your text?</p> <p>22 A. Yeah. Yeah.</p> <p>23 Q. And Mr. Furlong says, "Yes, you can, maybe,"</p> <p>24 right?</p> <p>25 A. Right.</p>	<p style="text-align: right;">Page 20</p> <p>1 Page 12, it's February 6, 2016?</p> <p>2 A. Uh-huh.</p> <p>3 Q. And then if you go to Page 13, do you see it is</p> <p>4 a continuation of a text from yourself back to</p> <p>5 Mr. Furlong?</p> <p>6 A. Right.</p> <p>7 Q. And in that text, you sent him some</p> <p>8 attachments. You say, "Morgan Freeman...I'm going to</p> <p>9 meet Ben Carson right now. I get to go to meet and</p> <p>10 visit George Bush in Dallas. This is surreal." Do you</p> <p>11 see that?</p> <p>12 A. Yes.</p> <p>13 Q. Mr. Furlong responds, correct?</p> <p>14 A. Yeah.</p> <p>15 Q. He says, "I was thinking he is known for being</p> <p>16 quiet, and you're not, so you could be his running mate.</p> <p>17 Not that I would vote for you, though!!" Do you see</p> <p>18 that?</p> <p>19 A. Right.</p> <p>20 Q. You responded, "Right," Mr. Lindell?</p> <p>21 A. Yeah.</p> <p>22 Q. You say, "Now, that's a great idea!"</p> <p>23 A. Yeah. Right.</p> <p>24 Q. "I'm getting together with Trump in three</p> <p>25 weeks...I think you would rather have two no filter loud</p>

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<p style="text-align: right;">Page 21</p> <p>1 voices." Do you see that?</p> <p>2 A. Yeah.</p> <p>3 Q. You also said, "Trump/Lindell 2016." Do you</p> <p>4 see that?</p> <p>5 A. Yeah.</p> <p>6 Q. And Mr. Furlong responds, correct?</p> <p>7 A. Right.</p> <p>8 Q. And then in response to Mr. Furlong's comment,</p> <p>9 you say, "LOL," right?</p> <p>10 A. Right. He said, "That would be an F'ing</p> <p>11 disaster, but entertaining." You see how we banter back</p> <p>12 and forth.</p> <p>13 Q. Indeed.</p> <p>14 A. You could go all the way back to George Bush.</p> <p>15 And I didn't know anything about politics, but this is</p> <p>16 just him and I -- when you do your deposition with him,</p> <p>17 he'll fill you in.</p> <p>18 Q. Were -- did you have a relationship with former</p> <p>19 President Trump in 2016, sir?</p> <p>20 A. No. I met him on August 15, 2016. I've never</p> <p>21 watched The Apprentice, didn't know who he was. I had</p> <p>22 heard his name, obviously.</p> <p>23 Met him in a meeting on August 15, 2016.</p> <p>24 Walked into his office. It was just him and I. He</p> <p>25 wanted -- he had asked me to meet him, and his questions</p>	<p style="text-align: right;">Page 23</p> <p>1 any idea he had sounded good.</p> <p>2 And I got back to Minnesota, and that's</p> <p>3 where Jim Furlong would come in. I went to a board</p> <p>4 meeting, and I said -- you know, I said, "I'm going to</p> <p>5 do a press release and tell the people I met Donald</p> <p>6 Trump."</p> <p>7 And half the people -- or not half the</p> <p>8 people, but one other guy in the room, the -- our -- Joe</p> <p>9 Springer, at the time, he said, "If you do that, you're</p> <p>10 going to lose half our business."</p> <p>11 I said, "Why?"</p> <p>12 I said, "That doesn't make sense to me."</p> <p>13 Obviously, media started, and I could walk</p> <p>14 across the street and there's CBS, CNN, FOX, everyone.</p> <p>15 How many more employees are you going to hire? How are</p> <p>16 you helping people with addiction? And I did -- went</p> <p>17 ahead and did the press release, and the media attacked</p> <p>18 me like I've never been attacked before at that time.</p> <p>19 And at that time, it was devastating. They</p> <p>20 were going to call me a drug dealer, and I had never</p> <p>21 dealt a drug in my life. I tried to rid Minneapolis of</p> <p>22 drugs by doing them all.</p> <p>23 And so there was a -- when I did that, it</p> <p>24 was like -- then I just -- I'm going what is with this,</p> <p>25 you know. Because my opinion, I met the guy, I did my</p>
<p style="text-align: right;">Page 22</p> <p>1 were, "How is it manufacturing MyPillow here in the</p> <p>2 USA?" That's what the meeting was about.</p> <p>3 And then he said -- he -- I said -- he</p> <p>4 said, "Whatever you do, don't tell them you were a crack</p> <p>5 addict."</p> <p>6 And I said -- you know, I said, "I used to</p> <p>7 be a crack addict." And I kind of looked at him, and I</p> <p>8 said, "But I'm going to have the Lindell Recovery</p> <p>9 Network and help addicts all over the country."</p> <p>10 And he said, "I'm going to shut the</p> <p>11 wall" -- "shut down the border and stop the drugs</p> <p>12 pouring in." And it was just a -- he just wanted my</p> <p>13 opinion as a businessman.</p> <p>14 And walked out of there about 40 minutes</p> <p>15 later. He had no other agenda. Went and talked to his</p> <p>16 employees and everything.</p> <p>17 I said, "Wow, I've never voted in my life,"</p> <p>18 because I didn't know a filibuster from a milibuster. I</p> <p>19 didn't know a Democrat from a Republican, and I knew</p> <p>20 nothing.</p> <p>21 And anyway, he -- I went and talked to his</p> <p>22 employees, and all his employees said, "Great man, great</p> <p>23 boss." And this guy was validating what I had just</p> <p>24 seen, because it was kind of surreal that he would even</p> <p>25 want my opinion from Minnesota for the manufacture, but</p>	<p style="text-align: right;">Page 24</p> <p>1 due diligence, and I'm getting attacked. And this media</p> <p>2 I broke bread with. I knew all the reporters,</p> <p>3 everything, and --</p> <p>4 MR. KACHOUROFF: Mike, hold on.</p> <p>5 What was the question? I forgot the</p> <p>6 question.</p> <p>7 THE WITNESS: Did I meet Donald Trump.</p> <p>8 MR. KACHOUROFF: Yeah.</p> <p>9 THE WITNESS: When did I meet him. Did</p> <p>10 I --</p> <p>11 MR. KACHOUROFF: If she wants to know more,</p> <p>12 she'll ask you more.</p> <p>13 THE WITNESS: Well, I'm telling her more.</p> <p>14 I mean, I'm going to tell her more.</p> <p>15 MR. KACHOUROFF: I know. I got it. I got</p> <p>16 it.</p> <p>17 Q. (BY MS. WRIGLEY) I'm going to ask you -- let</p> <p>18 me ask you --</p> <p>19 MR. KACHOUROFF: Believe me, she'll ask</p> <p>20 you.</p> <p>21 Q. (BY MS. WRIGLEY) I'll ask my follow-up</p> <p>22 question, Mr. Lindell.</p> <p>23 Have you been a supporter of former</p> <p>24 President Trump since 2016?</p> <p>25 A. Since I -- that's where I was getting to, to</p>

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<p style="text-align: right;">Page 25</p> <p>1 pre -- answer your question.</p> <p>2 When I got out of that office, I thought,</p> <p>3 you know, I don't know much about politics. I had never</p> <p>4 voted. I said this guy will be great if he does what he</p> <p>5 says. And then I went all in.</p> <p>6 And when I say -- by "all in," I went to</p> <p>7 this -- the second and third debate by myself, and they</p> <p>8 put me in the spin room, because I was a pretty</p> <p>9 nationally known figure then.</p> <p>10 And I remember MSNBC or FOX, both of them,</p> <p>11 asked me, you know, "Why are you supporting him?"</p> <p>12 And I just said, "You know what? I met</p> <p>13 him, and I think he'll be great because he's a</p> <p>14 businessman," and that I had done my due diligence.</p> <p>15 So...</p> <p>16 Q. So, Mr. Lindell, you've been all in on former</p> <p>17 President Trump since 2016, correct?</p> <p>18 A. Uh-huh.</p> <p>19 Q. And you've been a supporter of President Trump</p> <p>20 since 2016?</p> <p>21 A. That's -- since the day I met him.</p> <p>22 Q. And you were --</p> <p>23 A. Well, after I did my due diligence, correct.</p> <p>24 Q. And you were a supporter of former President</p> <p>25 Trump in connection with the 2020 election, right?</p>	<p style="text-align: right;">Page 27</p> <p>1 organization. It was the Minnesota something. It was a</p> <p>2 Lincoln dinner thing, I think.</p> <p>3 Q. And, in fact, in connection with the 2020</p> <p>4 presidential election, former President Trump made you</p> <p>5 head of his campaign in Minnesota, correct?</p> <p>6 A. It was like an honorary co-chair thing. I</p> <p>7 didn't do anything but just talk publicly.</p> <p>8 Q. Can I have you go back to the exhibit that</p> <p>9 we're looking at, sir, Exhibit 586, and I'm going to</p> <p>10 have you turn to Page -- give me two seconds to get my</p> <p>11 place -- Page 32. Just let me know when you're there.</p> <p>12 A. I see that.</p> <p>13 Q. Do you see at the top the date is July 24,</p> <p>14 2016?</p> <p>15 A. Yeah.</p> <p>16 Q. Mr. Furlong says, "I'm watching you. You do</p> <p>17 look presidential. You should run." Do you see that?</p> <p>18 A. Yeah.</p> <p>19 Q. And you sent him a number of attachments in</p> <p>20 response with the comment, "It would not surprise me if</p> <p>21 I ended up running some day...nothing surprises me any</p> <p>22 more." Do you see that?</p> <p>23 A. Yeah.</p> <p>24 Q. I'm going to ask you about another part of this</p> <p>25 exhibit, Page 42, sir. Do you see on Page 42, the date</p>
<p style="text-align: right;">Page 26</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And you've attended debates that</p> <p>3 President Trump has had in the --</p> <p>4 (Crosstalk.)</p> <p>5 MR. KACHOUROFF: I'm going to object to all</p> <p>6 this as relevance -- on the grounds of relevance.</p> <p>7 A. Yes, I've attended two debates.</p> <p>8 Q. (BY MS. WRIGLEY) And you've attended a number</p> <p>9 of political rallies with former President Trump,</p> <p>10 correct?</p> <p>11 A. That sounds -- yeah.</p> <p>12 Q. Okay. How many?</p> <p>13 A. I don't know. Over a hundred.</p> <p>14 Q. Do you continue to attend political rallies for</p> <p>15 former President Trump?</p> <p>16 A. What's that?</p> <p>17 Q. Do you continue to attend political rallies for</p> <p>18 former President Trump?</p> <p>19 A. Do I continue to? I went to, I think, two this</p> <p>20 year.</p> <p>21 Q. Have you donated money to the Trump campaign?</p> <p>22 A. No. Well, I take that back. 25,000, I</p> <p>23 believe. I don't know if it was to the campaign. It</p> <p>24 was to -- that was about a month ago to speak -- it was</p> <p>25 a speaking thing. It was more for that -- whatever that</p>	<p style="text-align: right;">Page 28</p> <p>1 at the --</p> <p>2 A. Yeah.</p> <p>3 Q. -- top is September 30, 2016?</p> <p>4 A. Yeah.</p> <p>5 Q. And then on the right, your messages below the</p> <p>6 attachments, do you see you mention, "I had dinner with</p> <p>7 the Trumps, and we talked MyPillow LOL." Do you see</p> <p>8 that?</p> <p>9 A. Yeah.</p> <p>10 Q. Mr. Furlong responded, "Nice," correct?</p> <p>11 A. Right.</p> <p>12 Q. You responded, "Donald talked me up for five</p> <p>13 minutes. He was arguing with his wife over which pillow</p> <p>14 to get. I sided with her LOL." Do you see that?</p> <p>15 A. Right.</p> <p>16 Q. And did you have the opportunity to have dinner</p> <p>17 with former President Trump and his wife in 2016?</p> <p>18 A. No. No. It was a dinner, and afterwards, I</p> <p>19 talked to them. That's when I first met her.</p> <p>20 Q. Okay.</p> <p>21 A. It was a five-minute conversation. So the</p> <p>22 dinner was probably 50 people in the room. We were not</p> <p>23 at their table. I got to talk to them for five minutes</p> <p>24 afterwards, just them two and myself as we -- as they --</p> <p>25 everybody had left.</p>

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<p style="text-align: right;">Page 29</p> <p>1 Q. Can I have you turn to Page 60, sir. At the 2 bottom, do you see that date for the last message is 3 July 18, 2017? Are you with me? 4 A. Yeah. 5 Q. Mr. Furlong states, "Is anything that goes on 6 today going to be broadcast on any channel, and what 7 show did you say was going to air this week? I want to 8 tell the agents." Do you see that? 9 A. Yeah. 10 Q. Let me ask you this: At this point in time in 11 July of 2017, did Mr. Furlong have responsibilities for 12 MyPillow at all? 13 A. Yeah. He was running -- running our home shows 14 and fairs. We have a whole other wing of our business. 15 There's probably 90 -- 90 people that never go home. 16 They go show to show. It's a very complex business 17 with -- we don't have it any more because they cancelled 18 us, but -- well, we do in some respect. State fairs, 19 Costco. We go -- go there and do a three-day show, a 20 four-day show. 21 Somebody's asking there, is that they're -- 22 I would do a lot of speaking. Not anything political, 23 but it would be -- if I was going to be speaking on -- 24 back then, it was all about MyPillow and addiction, you 25 know. I do speaking at a lot of churches.</p>	<p style="text-align: right;">Page 31</p> <p>1 see that? 2 A. Yes. 3 Q. And then you included a link to a C-SPAN 4 article that has the title, "President holds roundtable 5 Made America Agenda." 6 A. Right. That was national. There was eight, 7 nine, ten businesses invited to the White House for Made 8 in America. 9 Q. If you go to the next page on 62, it's a 10 continuation of that text chain on the 19th of 11 July 2017. Do you see that in the middle of the 12 attachments you wrote to Mr. Furlong, "Everyone in the 13 White House wanted my picture. So surreal"? Do you see 14 that? 15 A. That's correct. 16 Q. And then if you go to the next page, on 17 Page 63, do you see after the attachments Mr. Furlong 18 responded, "Cool pics and nice suit"? Do you see that? 19 A. Yeah. 20 Q. And then the next day, you message him back on 21 July 20th, 2017, correct? 22 A. Uh-huh. 23 Q. And you say, "People at the White House asked 24 me if I would consider running for president in 2024. 25 At least four people asked me that." Do you see that?</p>
<p style="text-align: right;">Page 30</p> <p>1 So if he was -- if there were going to be 2 broadcasts or something with MyPillow, any special -- 3 anything we were doing -- I did like so many appearances 4 on podcasts. That's what I did. That was a big part of 5 our business. You would do a podcast -- or Sean Hannity 6 or CNN, whatever I would be on, they would want to know 7 because we would get -- we were talking about the 8 pillow. We would get great sales, and these people, 9 they wanted the agents to be aware of it. 10 Q. If you go to the next page on Page 61, do you 11 see that you responded, "Sorry, I just saw this"? Do 12 you see that? 13 A. Uh-huh. 14 Q. Is that a yes? I'm sorry, Mr. Lindell. 15 A. What's that? 16 Q. Was that a yes? 17 A. It was a yes. 18 Q. And then Mr. Furlong responded, "You'd be a 19 good boy in the White House." Do you see that? 20 A. Yes. 21 Q. You respond, "I'm now going on Fox & Friends 22 tomorrow," correct? 23 A. Yes. 24 Q. And the next day, July 19, 2017, Mr. Furlong 25 texted you, "Wow. Your Trump's right-hand man." Do you</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Correct. 2 Q. And were you, in fact, asked during a visit at 3 the White House in 2017 about potentially running for 4 president in 2024? 5 A. These were the little kids that run around that 6 give -- guide you through the thing. They're interns. 7 They were the ones saying, "You should run in 2024." 8 Q. If you go to the very last page of this 9 exhibit, Page 93, I'm going to ask you about one last 10 one. Do you see the date at the top is June 30th, 2018? 11 Do you see that? 12 A. Yeah. 13 Q. And that's about a year later, correct, from 14 the messages we just saw? 15 A. Yeah. 16 Q. And then you write to Mr. Furlong, "Tell the 17 vendors it's going to be great again." You send an 18 attachment. And you write, "I think I'm going to run in 19 2024." Do you see that? 20 A. Yeah. 21 Q. And Mr. Furlong responded, correct? 22 A. Just a crying face, yes. Once again, our 23 kidding back and forth. He's got a little crying face 24 at me. 25 Q. You can put that aside, and I'm going to show</p>

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<p style="text-align: right;">Page 33</p> <p>1 you another document, sir.</p> <p>2 A. What's that?</p> <p>3 Q. You can put that one to the side. I'm going to</p> <p>4 mark and show you another document.</p> <p>5 MR. KACHOUROFF: What did you mark this one</p> <p>6 as? I'm sorry.</p> <p>7 MS. WRIGLEY: This one, 586.</p> <p>8 MR. KACHOUROFF: I'm sorry.</p> <p>9 MS. WRIGLEY: No. No. That's okay.</p> <p>10 MR. KACHOUROFF: I don't want to get them</p> <p>11 mixed up.</p> <p>12 MS. WRIGLEY: I'm going to mark the next</p> <p>13 one as 587. Thank you.</p> <p>14 (Exhibit 587 marked.)</p> <p>15 Q. (BY MS. WRIGLEY) Mr. Lindell, I'm going to</p> <p>16 hand you what's been marked as Exhibit 587.</p> <p>17 And, sir, just for the record, I saw you</p> <p>18 looking at your phone. You're not recording or</p> <p>19 anything, are you?</p> <p>20 A. No. Do you want me to?</p> <p>21 Q. No.</p> <p>22 A. Okay.</p> <p>23 Q. We have an official video, and you can get a</p> <p>24 copy of it, so --</p> <p>25 A. Yeah -- but the FBI. Can you hear that, FBI?</p>	<p style="text-align: right;">Page 35</p> <p>1 was pulled from and exactly the date it was pulled from.</p> <p>2 A. Yep.</p> <p>3 Q. And sometimes in order for all of the</p> <p>4 information, when it gets printed up from the Internet</p> <p>5 to get captured, sometimes the information repeats from</p> <p>6 one page to another --</p> <p>7 A. I understand.</p> <p>8 Q. -- but I'll represent that it's all in here.</p> <p>9 A. Right.</p> <p>10 Q. Do you see this article from CNN Politics</p> <p>11 titled, "How Mike Lindell, the MyPillow guy, became a</p> <p>12 midterm messenger"?</p> <p>13 A. Yes.</p> <p>14 Q. Are you familiar with this article, sir?</p> <p>15 A. I've seen that picture a million times. That</p> <p>16 was that summit we went to. That's the one you just</p> <p>17 talked about a little bit ago.</p> <p>18 Q. The date of the article is November 4th, 2018.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. The article starts, "President Donald Trump</p> <p>22 isn't get much sleep, and neither is Mike Lindell. But</p> <p>23 with days to go before the midterm elections, don't</p> <p>24 blame their pillows. Lindell, the mustachioed MyPillow</p> <p>25 inventor and infomercial star, is doing his part ahead</p>
<p style="text-align: right;">Page 34</p> <p>1 Yeah. I've got to turn you off.</p> <p>2 Q. No. No. I just don't know that -- to do my</p> <p>3 job --</p> <p>4 A. Well, you know, the FBI listens to everything I</p> <p>5 do, so it's just -- but I'll do it.</p> <p>6 Q. It listens to everyone --</p> <p>7 A. They might take a -- maybe they're taking the</p> <p>8 day off today.</p> <p>9 Q. Listens to everything everyone does, not just</p> <p>10 you, I'm sure.</p> <p>11 Mr. Lindell, I've handed to you what's been</p> <p>12 marked as 587. Just for the record, this is a news</p> <p>13 article from CNN that's been printed up.</p> <p>14 A. Yeah.</p> <p>15 Q. Just for the record, it has an Exhibit No. 140</p> <p>16 on the cover sheet. That's because this is a news</p> <p>17 article that was attached to the complaint in this case.</p> <p>18 A. Yeah.</p> <p>19 Q. I'm going to have you turn to the second page</p> <p>20 of this exhibit.</p> <p>21 A. Yep.</p> <p>22 Q. This is a CNN news article. And just so you</p> <p>23 understand the information on here, at the bottom</p> <p>24 left-hand corner, it's always a capture sticker. It</p> <p>25 identifies exactly where on the Internet this article</p>	<p style="text-align: right;">Page 36</p> <p>1 of next Tuesday, hitting the road in support of</p> <p>2 conservative candidates and popping up at many a Trump</p> <p>3 rally across the country. Lindell, one of just a few</p> <p>4 celebrity endorsers, gave Trump his seal of approval</p> <p>5 early and remains a key supporter." Do you see that?</p> <p>6 A. Yes.</p> <p>7 MR. KACHOUROFF: This is all hearsay, and</p> <p>8 I'm objecting on the grounds of relevance, just so you</p> <p>9 know.</p> <p>10 Q. (BY MS. WRIGLEY) And in November of 2018, were</p> <p>11 you hitting the road in support of conservative</p> <p>12 candidates at Trump rallies across the country?</p> <p>13 A. I didn't do many then, I don't believe. I</p> <p>14 don't -- I don't remember -- if I did a rally, I would</p> <p>15 go there, sometimes speak, sometimes not. I -- I'm</p> <p>16 guessing I wasn't doing much speaking at the rallies.</p> <p>17 But I did go his rallies. I enjoyed going to the</p> <p>18 rallies, yeah.</p> <p>19 Q. In November --</p> <p>20 A. Did I endorse any people back then? I don't</p> <p>21 think so. I don't endorse too many people.</p> <p>22 Q. In November of 2018, had you endorsed former</p> <p>23 President Trump?</p> <p>24 A. What's that?</p> <p>25 Q. In November of 2018, had you endorsed former</p>

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<p style="text-align: right;">Page 37</p> <p>1 President Trump?</p> <p>2 A. He wasn't running then.</p> <p>3 Q. Understood.</p> <p>4 A. Is that a trick question? I was --</p> <p>5 I endorsed --</p> <p>6 Q. Were you a supporter then?</p> <p>7 A. I endorsed a guy from Minnesota. That's where</p> <p>8 I got involved, Doug Wardlow. He's also my attorney</p> <p>9 now. He was running for Attorney General of Minnesota.</p> <p>10 That's where I was really -- I really got involved on.</p> <p>11 He was one of the candidates I endorsed then. There may</p> <p>12 have been one or two others, but that's -- Jason Lewis,</p> <p>13 I think, from Minnesota. I was kind of concentrating on</p> <p>14 Minnesota candidates. By then, I realized politics were</p> <p>15 kind of important. Before I just started, I was smoking</p> <p>16 crack.</p> <p>17 Q. I'm going to have you skip ahead to the sixth</p> <p>18 page of this document, and it's a section titled, "The</p> <p>19 MyPillow Guy."</p> <p>20 A. Yeah.</p> <p>21 Q. Do you see at the bottom there's a heading,</p> <p>22 "The MyPillow Guy"? Are you with me?</p> <p>23 A. Yep.</p> <p>24 Q. It states, "While some companies have faced</p> <p>25 backlash for supporting Trump, Lindell says the pillow</p>	<p style="text-align: right;">Page 39</p> <p>1 you know, why should it, you know.</p> <p>2 Q. I'm going to have you jump ahead to Page 7,</p> <p>3 sir --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- and ask you about something at the very</p> <p>6 bottom, and just let me know when you are there. Like</p> <p>7 where -- do you see where you say, "I want to get these</p> <p>8 people help, he said"? Do you see that section?</p> <p>9 A. What's that?</p> <p>10 Q. Third paragraph from the bottom.</p> <p>11 MR. KACHOUROFF: Nicole, I'm going to -- if</p> <p>12 you're going to -- I'm not trying to be obstructive --</p> <p>13 MS. WRIGLEY: No. No. That's fine.</p> <p>14 MR. KACHOUROFF: -- but let him read the</p> <p>15 whole -- that whole section, not the whole article.</p> <p>16 MS. WRIGLEY: Yeah. Yeah. That's fine.</p> <p>17 MR. KACHOUROFF: My -- my --</p> <p>18 MS. WRIGLEY: I'm actually going to ask him</p> <p>19 after that part of it, onto the next page.</p> <p>20 MR. KACHOUROFF: Can you give him that</p> <p>21 whole section to read so it's at least in some context</p> <p>22 for him?</p> <p>23 MS. WRIGLEY: Yeah.</p> <p>24 Q. (BY MS. WRIGLEY) So, Mr. Lindell, I'm going to</p> <p>25 ask you about the last two paragraphs on Page 7 and then</p>
<p style="text-align: right;">Page 38</p> <p>1 business hasn't been affected by his politics. In fact,</p> <p>2 it's growing. 'It's been very good for business, but I</p> <p>3 just do what I'm supposed to do, what God's called me to</p> <p>4 do, and I really -- I'm not going to back down."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Around this time of the article, November 2018,</p> <p>8 was it good for MyPillow's business to support Trump?</p> <p>9 A. We had gotten through -- let me backtrack a</p> <p>10 little. When that attack came in '16 when I did a press</p> <p>11 release, the Better Business Bureau came out and lowered</p> <p>12 MyPillow's rating from an A Plus to an F. It was all</p> <p>13 political, hundred percent political. I was up for</p> <p>14 their Torch Award, I was the media's darling, and I was</p> <p>15 their highest rated company in history for that corrupt</p> <p>16 organization. And they took an A Plus to an F.</p> <p>17 They did a press release on January 2nd,</p> <p>18 2017. At that time, Costco was going to drop us, FOX</p> <p>19 dropped us, and it was a big fight with the Better</p> <p>20 Business Bureau, which is still an F.</p> <p>21 That hurt us substantially then, but by the</p> <p>22 time as we absorbed that first impact, I guess that it</p> <p>23 was -- we were back to normal business as usual where</p> <p>24 MyPillow was at a steady uphill climb. It hadn't hurt</p> <p>25 us being -- because I got political on one -- when --</p>	<p style="text-align: right;">Page 40</p> <p>1 the information going onto Page 8.</p> <p>2 A. Okay.</p> <p>3 Q. And then you can take a look at it, review it,</p> <p>4 and let me know when you're ready.</p> <p>5 A. Yeah. If you start up above, I'm reading here,</p> <p>6 it says -- this is the time that everybody was pulling</p> <p>7 their ads from Fox News. So with MyPillow not leaving,</p> <p>8 at least we were -- but it did hurt us money-wise,</p> <p>9 because they went to other parts of Fox, and then the</p> <p>10 price of the ads went up. They want to boycott me.</p> <p>11 That's fine.</p> <p>12 So you're asking me about the "Lindell is</p> <p>13 open about his crack cocaine addiction" or what?</p> <p>14 Q. Do you see at the bottom where it says, "As to</p> <p>15 whether he'd consider entering the political arena</p> <p>16 himself, Lindell isn't ruling it out"? Do you see that?</p> <p>17 A. Yeah, I don't -- it doesn't have a quote by it.</p> <p>18 I don't know -- I see it there.</p> <p>19 Q. And below there it says, "Right now, no, but if</p> <p>20 God wanted me to do it, if I got it in prayer, I would</p> <p>21 do it tomorrow."</p> <p>22 A. That's right. I pray about everything I do.</p> <p>23 Q. Do you recall being asked by CNN or any other</p> <p>24 media in 2018 whether you would consider entering the</p> <p>25 political arena?</p>

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<p style="text-align: right;">Page 41</p> <p>1 A. I have no idea. I was interviewed thousands of 2 times a week. Yeah. 3 Q. In -- 4 A. Hundreds for sure. I don't want to say any 5 fake news there. Hundreds. 6 Q. In 2018, is it fair to say that you had not 7 ruled out a run for political office in the future? 8 A. Like I just said, the answer's right there. I 9 do what God has me do. I pray about everything I do. 10 I'm very proactive in prayer. 11 Q. Okay. You can put that one to the side. 12 I'll probably -- I'm going to show you 13 another document, sir. This one will be 588. 14 (Exhibit 588 marked.) 15 Q. (BY MS. WRIGLEY) I'm going to hand to you 16 what's been marked Exhibit 588. And I'll represent for 17 the record that this is a text chain that was produced 18 as DEF 047408 between yourself and an individual, Scott 19 Baio. 20 The full text chain, just for the record, 21 is actually 92 pages. It's long. That's why we didn't 22 print the whole thing up. And I've excerpted, and if 23 you look at the page numbers with the decimal points, 24 the first page, and then Page 15 and 16 of that document 25 produced.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. Okay. And are you friends with Mr. Baio? 2 A. Now I am. I don't know if I was back then. I 3 had just met him. I don't know if this is -- what year 4 this is. 5 Q. I'm going to ask you about something on the 6 next page, which is Page 15 of this produced text chain. 7 And do you see at the bottom of Page 15, there's a date 8 in the middle, January 24th, 2020? 9 A. Yeah. 10 Q. Okay. And then if you look above there -- 11 sorry. At the very top, do you see there's a date, 12 January 17, 2020? Sorry. I'm directing you back to the 13 top on Page 13. Are you with me? 14 A. Yes. 15 Q. Okay. On January 17, 2020, Mr. Baio texted 16 you, "Brilliant cover. Thanks for the books." Do you 17 see that? 18 A. Yeah. 19 Q. You responded with a thumbs up and said, "Hey, 20 Scott, I'm going on Fox Business News in five minutes." 21 Do you see that? 22 A. Correct. 23 Q. Then Mr. Baio responds, "Okay. Got it on. 24 Good stuff. Run for something...governor." Do you see 25 that?</p>
<p style="text-align: right;">Page 42</p> <p>1 A. Yeah. Yes. 2 Q. Okay. Mr. Lindell, do you see at the top on 3 the first page this text chain starts May 9th, 2018? 4 A. That's correct. 5 Q. And do you recognize that phone number at the 6 top under your name? 7 A. Yes. 8 Q. Is that your phone number? 9 A. Yes. 10 Q. And then there's a Scott Baio. Do you see 11 that? 12 A. That's correct. 13 Q. And who is Mr. Baio? 14 A. He's -- he played Chachi on Happy Days. You 15 might have watched. 16 Q. I did. 17 A. Yeah. 18 Q. Charles in Charge, maybe? 19 MR. KACHOUROFF: That's why she's asking 20 the questions. 21 MS. WRIGLEY: I'm more of an '80's baby. 22 A. Yeah, that's Scott Baio. 23 Q. (BY MS. WRIGLEY) And he's an actor or former 24 actor? 25 A. Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Yes. 2 Q. And do you recall in early 2020, Mr. Baio 3 texting you about running for governor? 4 A. No. This is -- I mean, he put that -- he had 5 just read my book. When my book came out, I said -- if 6 you'd read my book, you'd find there's a lot of divine 7 things that happened. 8 So he said, "Run for governor." 9 And I said, "I think governor," and that's 10 when -- "and then 2024, look at something bigger." 11 Q. You responded to Mr. Baio in this text chain, 12 correct? 13 A. Yeah. 14 Q. And you said, "I think governor, and then 2024, 15 look at something bigger." Do you see that? 16 A. Yes. 17 Q. He responded on January 24, 2020, "Lou Dobbs?" 18 Do you see that? 19 A. Yes. 20 Q. And then you responded, "Yes, I was on there 21 tonight." Do you see that? 22 A. Yes. 23 Q. And Mr. Dobbs, at this point in time, had a 24 show on Fox News, correct? 25 A. On Fox Business News.</p>

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<p style="text-align: right;">Page 45</p> <p>1 Q. Called Lou Dobbs Tonight, right?</p> <p>2 A. Yes.</p> <p>3 Q. I'm going to have you turn to the next page,</p> <p>4 Page 16. Do you see at the bottom in the middle there's</p> <p>5 a date February 1st, 2020?</p> <p>6 A. Uh-huh.</p> <p>7 Q. And Mr. Baio texted you, "You around over the</p> <p>8 weekend?" Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And you responded, "In Mar-a-Lago," correct?</p> <p>11 A. Yes.</p> <p>12 Q. And what's Mar-a-Lago?</p> <p>13 A. Mar-a-Lago is where the president lives --</p> <p>14 Q. And Mr. Baio --</p> <p>15 A. -- our real president. Let me say our real</p> <p>16 president.</p> <p>17 Q. Okay. Are you referring to where former</p> <p>18 President Trump lives?</p> <p>19 A. I call him the real president. But yes, that's</p> <p>20 correct.</p> <p>21 Q. Okay. Mr. Baio responded "Nice," correct?</p> <p>22 A. Yes.</p> <p>23 Q. And then you responded, "The president made me</p> <p>24 his MN campaign director," correct?</p> <p>25 A. Right.</p>	<p style="text-align: right;">Page 47</p> <p>1 Q. Yes. The one that we've just looked at was</p> <p>2 February 2020.</p> <p>3 A. But that doesn't make sense if you have a</p> <p>4 campaign director over here. So it was the 2020</p> <p>5 campaign director or 2018?</p> <p>6 Q. This was -- this text message is from 2020.</p> <p>7 A. Okay. Well, then I guess it just carried over</p> <p>8 to 2020.</p> <p>9 Q. You can put that aside. I'm going to show you</p> <p>10 another document, sir.</p> <p>11 A. Okay.</p> <p>12 (Exhibit 589 marked.)</p> <p>13 Q. (BY MS. WRIGLEY) This is 589, sir. I'll</p> <p>14 represent for the record this is a text chain produced</p> <p>15 between yourself and Paul Ess. The Bates number for the</p> <p>16 document produced is DEF 047403. Like the rest one,</p> <p>17 this one is long. It's over -- it's about 45 pages, so</p> <p>18 I just have excerpts, and the excerpts are Page 24</p> <p>19 through Page 30.</p> <p>20 And then the -- the black on the first</p> <p>21 page, sir, I'll just represent that is the way it was</p> <p>22 produced to us, with the assumption by the attorneys</p> <p>23 that this has been redacted by defense counsel for some</p> <p>24 reason.</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 46</p> <p>1 Q. And at this point in time, were you made -- did</p> <p>2 President Trump make you the campaign director in</p> <p>3 Minnesota?</p> <p>4 A. No. It was an honorary co-director.</p> <p>5 Q. What were your responsibilities in that</p> <p>6 position?</p> <p>7 A. There wasn't any. Whatever I wanted to do.</p> <p>8 There's no directives whatsoever. 100 percent, not one</p> <p>9 directive.</p> <p>10 Q. What was the -- what was the purpose of your</p> <p>11 role?</p> <p>12 A. I had no idea. I went around like a surrogate</p> <p>13 in Minnesota. I was -- I lived in Minnesota. I went</p> <p>14 around when -- at that time, I did -- I spoke at the</p> <p>15 rallies when he came there. I was pushing for Doug</p> <p>16 Wardlow. Went around with Jason Lewis. You know, that</p> <p>17 was about it.</p> <p>18 Q. At that point in time, were you engaging in</p> <p>19 activities to support President Trump's run for office</p> <p>20 in 2020?</p> <p>21 A. What now?</p> <p>22 Q. At that point in time, were you engaging in</p> <p>23 activities to support President Trump's run for office</p> <p>24 in --</p> <p>25 A. What's the date on this thing? This is '18?</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Because they don't believe the information is</p> <p>2 discoverable is my sense.</p> <p>3 Who is Paul Ess?</p> <p>4 A. He's a -- he was a shareholder at that time in</p> <p>5 MyPillow. He had stock. It's an employee-owned</p> <p>6 company.</p> <p>7 Q. And when you say "at that time," what period of</p> <p>8 time, sir?</p> <p>9 A. I think he sold his stock, I don't know, in</p> <p>10 2020, 2021, maybe. I don't know.</p> <p>11 Q. Was he ever a member of the board?</p> <p>12 A. No.</p> <p>13 Q. He was a shareholder of MyPillow, though?</p> <p>14 A. Yes.</p> <p>15 Q. And how many -- what was the percentage of</p> <p>16 shareholder of --</p> <p>17 A. I have no idea. 4 or 5 percent. Who knows.</p> <p>18 Q. And is Mr. Ess a friend of yours, sir?</p> <p>19 A. Yeah, I would consider him a friend.</p> <p>20 Q. And how do you know him?</p> <p>21 A. I knew him -- I had met him -- he's from my</p> <p>22 area. I guess I had met him years earlier. Lost touch</p> <p>23 with him. I met him -- he used to be -- frequent one of</p> <p>24 my restaurants -- or my restaurant I acquired that I had</p> <p>25 I think in the '90s. I think he -- he was dating a</p>

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<p style="text-align: right;">Page 49</p> <p>1 friend of mine's daughter.</p> <p>2 Q. Okay. Sir, I'm going to ask you about a text</p> <p>3 chain that starts with you and Mr. Ess on Page 24. And</p> <p>4 if you look at the bottom, it's the second page of the</p> <p>5 document, there's a date May 19th, 2020. Do you see</p> <p>6 that?</p> <p>7 A. Yeah.</p> <p>8 Q. And do you see Mr. Ess sends you a text about</p> <p>9 something he watched on last Saturday's SNL? Do you see</p> <p>10 that?</p> <p>11 A. Right.</p> <p>12 Q. And this was an SNL where Alec Baldwin called</p> <p>13 in as Trump and mentioned your name. Do you see that?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. And then if you look -- if you go to 25,</p> <p>16 do you see that you responded?</p> <p>17 A. Yeah.</p> <p>18 Q. You say --</p> <p>19 A. "Was it tonight?"</p> <p>20 Q. -- "No one told me. How are you watching it?"</p> <p>21 Do you see that?</p> <p>22 A. Right.</p> <p>23 Q. And then Mr. Ess responds that he recorded</p> <p>24 it --</p> <p>25 A. Right.</p>	<p style="text-align: right;">Page 51</p> <p>1 right away.</p> <p>2 I bought \$10 million worth, and -- to give</p> <p>3 away and to save the country, and met with the</p> <p>4 president. And then we had arranged with the FDA. The</p> <p>5 FDA shut it down.</p> <p>6 And so to this day, I'm still sitting on</p> <p>7 it. It all got expired. Tried to get it to the</p> <p>8 Philippines when they wouldn't let it here. Tried to</p> <p>9 get it to Brazil, Israel.</p> <p>10 And so that's where I'm sitting now, with a</p> <p>11 \$6 million debt to the IRS because they wouldn't let me</p> <p>12 use that deduction back then because it all got</p> <p>13 outdated. So that's what that refers to.</p> <p>14 The president couldn't do anything. He was</p> <p>15 trying to get a -- at that time to get a -- what's it</p> <p>16 called, something so we could bring it to the -- to</p> <p>17 the -- he had done that right to -- right to try, but we</p> <p>18 tried -- he had to get it through the FDA, through -- I</p> <p>19 forget the guy's name -- Hahn -- Hahn's his last name,</p> <p>20 head of the FDA, and they stopped it and wanted to make</p> <p>21 it a -- a drug rather than a -- or a supplement, which</p> <p>22 it already was, and it would have opened up everything.</p> <p>23 And so MyPillow stayed open. Everybody</p> <p>24 took it. We never got sick. And it would have saved</p> <p>25 the country. It would have saved a lot of lives. So it</p>
<p style="text-align: right;">Page 50</p> <p>1 Q. -- and was watching it now. Do you see that?</p> <p>2 A. Right.</p> <p>3 Q. Now, I'm going to -- this same date continues</p> <p>4 with text back and forth, but I want to have you skip a</p> <p>5 couple pages to Page 27. It's all on the same date.</p> <p>6 Just let me know when you're there.</p> <p>7 A. Uh-huh.</p> <p>8 Q. Do you see -- if you look a little bit below</p> <p>9 the middle in the right, you text Mr. Ess saying, "The</p> <p>10 president and I will play this first before we announce</p> <p>11 it. Paul, we've been giving it to hundreds under the</p> <p>12 radar. It will change history, and I for sure should</p> <p>13 win president in 2024. Thumbs up." Do you see that?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Okay. Do you know what this is in reference to</p> <p>16 in terms of like playing this first before it's</p> <p>17 announced?</p> <p>18 A. I bought -- I put in \$10 million into a guy</p> <p>19 that reached out to me. After I spoke at the Rose</p> <p>20 Garden, he reached out -- it was before the China virus</p> <p>21 shut everything down, and this guy approached me with</p> <p>22 the cure to the virus, which is like an Ivermectin or a</p> <p>23 hydroxychloroquine. It was called "cerativire." I had</p> <p>24 it validated with doctors, including Ben Carson, and it</p> <p>25 was a supplement so I could distribute to the country</p>	<p style="text-align: right;">Page 52</p> <p>1 was pretty sad. The FDA basically shut it down.</p> <p>2 Q. And when you say "virus," you're referring to</p> <p>3 COVID, correct?</p> <p>4 A. What's that?</p> <p>5 Q. When you say "virus," you're referring to</p> <p>6 COVID, correct?</p> <p>7 A. Yeah. The China virus, yeah.</p> <p>8 Q. And when you had referred to the president,</p> <p>9 you're referring to Trump, correct?</p> <p>10 A. What's that?</p> <p>11 Q. When you said "the president," you were</p> <p>12 referring to Trump, correct?</p> <p>13 A. Yeah, our real president. That's correct.</p> <p>14 Q. Okay. And you did indicate to Mr. Ess that you</p> <p>15 thought that that was going to change history and that</p> <p>16 you would for sure win president in 2024, correct?</p> <p>17 A. Yeah. Once again, sarcasm here. You've got to</p> <p>18 talk to these liberals.</p> <p>19 Q. And Mr. Ess responded to you, you see that at</p> <p>20 the bottom, "Wow. I never would have guessed you would</p> <p>21 find it. Thought a pharmaceutical would develop it."</p> <p>22 Do you see that?</p> <p>23 A. That's correct. Right.</p> <p>24 Q. And if you go to the next page you said, "A guy</p> <p>25 brought it to me in Easter Sunday. God told him to only</p>

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<p style="text-align: right;">Page 53</p> <p>1 trust Mike Lindell." This is a message from you,</p> <p>2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. And you said, "I met with the president and</p> <p>5 vice president for an hour alone, and we have been</p> <p>6 getting it ready ever since. Ben Carson and I myself</p> <p>7 have done a lot to get this ready." Do you see that?</p> <p>8 A. Correct.</p> <p>9 Q. Mr. Ess responds, correct?</p> <p>10 A. "He should win in a bigger landslide than I</p> <p>11 anticipated."</p> <p>12 Q. And did you understand that he was referring to</p> <p>13 Trump?</p> <p>14 A. No.</p> <p>15 Q. You responded to Mr. Ess, correct?</p> <p>16 A. Yeah.</p> <p>17 Q. You said, "He will crush it. Then I am running</p> <p>18 for MN governor in 2022 and president in 2024. Crazy.</p> <p>19 Who would have thought. Did you get my book yet?" Do</p> <p>20 you see that?</p> <p>21 A. Yes.</p> <p>22 Q. When you say, "He will crush it," who are you</p> <p>23 referring to?</p> <p>24 A. The president, our real president.</p> <p>25 Q. And then -- and Trump, correct?</p>	<p style="text-align: right;">Page 55</p> <p>1 add-on because I can't stand the crap in MN." And</p> <p>2 that's Minnesota, correct?</p> <p>3 A. Right.</p> <p>4 Q. And Mr. Ess responds, "Good for you," correct?</p> <p>5 A. Right.</p> <p>6 Q. And then you responded with a picture of you</p> <p>7 and Trump in the Oval Office?</p> <p>8 A. Right.</p> <p>9 Q. And he responded, "... I don't want to lose</p> <p>10 your trust by asking you first. Can I tell anyone about</p> <p>11 this, the pills? If not, trust me, i won't tell a</p> <p>12 soul." Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And Mr. Ess is asking you about the medication</p> <p>15 that you were talking about?</p> <p>16 A. It was a supplement.</p> <p>17 Q. The supplement?</p> <p>18 A. Yeah. It kept him from getting it, too.</p> <p>19 Q. Okay. That's all I have for that one, sir.</p> <p>20 You can put it aside.</p> <p>21 I'm going to show you another text. This</p> <p>22 one will be Exhibit 590.</p> <p>23 (Exhibit 590 marked.)</p> <p>24 Q. (BY MS. WRIGLEY) Here you go. Once again, for</p> <p>25 the record, this is a text message chain that's much</p>
<p style="text-align: right;">Page 54</p> <p>1 A. Yes.</p> <p>2 Q. And then at that point in time, were you</p> <p>3 considering running for governor?</p> <p>4 A. No. Once again, that's sarcasm with a friend</p> <p>5 of mine. You have to know Paul. You have -- you see,</p> <p>6 he's not focused on a fortune could be made on a</p> <p>7 vaccine.</p> <p>8 Q. Now --</p> <p>9 A. He's not responding to me by saying I'm going</p> <p>10 to be president, I'll tell you that.</p> <p>11 Q. Now, if you turn to Page 29, the next page,</p> <p>12 Mr. Ess is texting you at the top. Do you see that?</p> <p>13 A. Uh-huh.</p> <p>14 Q. And at the bottom of his text, the one at the</p> <p>15 top, he says, "You told me you were going to run for</p> <p>16 president after Trump that October night in Shakopee."</p> <p>17 Is that how you say it?</p> <p>18 A. Yeah.</p> <p>19 Q. "Didn't think you were running for governor</p> <p>20 until a few months ago. Good luck with all that. You</p> <p>21 got my vote..." Do you see that?</p> <p>22 A. Right.</p> <p>23 Q. And you responded, correct?</p> <p>24 A. Yeah.</p> <p>25 Q. Mr. Lindell, you stated, "The governor was an</p>	<p style="text-align: right;">Page 56</p> <p>1 longer. This one was around 125 pages. It was produced</p> <p>2 as DEF 034862. This is an excerpt of Page 1 and Page 20</p> <p>3 of that document.</p> <p>4 Looking at the top, sir, do you see this is</p> <p>5 a text chain between yourself and Kim Rasmussen?</p> <p>6 A. Yeah.</p> <p>7 Q. Who is Ms. Rasmussen?</p> <p>8 A. She's worked with MyPillow since 2010. She</p> <p>9 doesn't any more.</p> <p>10 Q. When did she stop working for MyPillow?</p> <p>11 A. I don't know. It was probably 2019, 2020,</p> <p>12 somewhere in there.</p> <p>13 Q. What was her position at MyPillow, sir?</p> <p>14 A. What's that?</p> <p>15 Q. What was her position at MyPillow?</p> <p>16 A. She did bookkeeping, worked in bookkeeping.</p> <p>17 Q. Was Ms. Rasmussen ever a member of MyPillow's</p> <p>18 board?</p> <p>19 A. Yes.</p> <p>20 Q. During what period of time?</p> <p>21 A. What?</p> <p>22 Q. During what period of time?</p> <p>23 A. I don't know. Probably -- I think -- yeah,</p> <p>24 2000 -- I don't know. '12 to '18, maybe. I don't know.</p> <p>25 I don't know the exact dates.</p>

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<p style="text-align: right;">Page 57</p> <p>1 Q. Was Ms. Rasmussen ever a shareholder of 2 MyPillow? 3 A. She still is. 4 Q. And what percentage of shares does she own of 5 MyPillow? 6 A. I don't know. It's an employee-owned company. 7 2 percent, 1 percent. I have no idea. She had more at 8 one time, but when she left -- you have to -- there's an 9 employee agreement when they come in. So if you don't 10 stay, you wouldn't get those shares. It's like a work 11 agreement where you get shares as you work. So she -- I 12 don't know what she ended up with. 13 Q. Mr. Lindell, are you the majority shareholder 14 of MyPillow? 15 A. Yes. 16 Q. And in 2020 and 2021, were you the majority 17 shareholder of MyPillow? 18 A. Yes. 19 Q. Currently, what is your percentage of ownership 20 of MyPillow? 21 A. It's probably a little over 50 percent. 22 Q. And -- 23 A. I think they put a bylaw in there when it was 24 below 50 percent, the board put a bylaw and said that I 25 can't go below 50, at least right now. It has to be</p>	<p style="text-align: right;">Page 59</p> <p>1 is -- Exhibit 590 is a text between yourself and Kim 2 Rasmussen? 3 A. Yeah. 4 Q. Do you see this starts on March 30th, 2020? Do 5 you see that? 6 A. Uh-huh. Right. 7 Q. Okay. I'm going to ask you about something on 8 Page 20, which is the second page of 590. Do you see in 9 the middle of the page there's a date, June 10th, 2020? 10 A. Yes. 11 Q. Ms. Rasmussen -- Rasmussen texts you, "How was 12 your meeting with Trump?" Do you see that? 13 A. Yes. 14 Q. And you responded, sir, correct? 15 A. Yes. 16 Q. You say, "It was awesome. Met for two and a 17 half hours. He and Pence encouraged me to run for 18 governor, too. The president read my book and wouldn't 19 stop talking about it...LOL." Do you see that? 20 A. Right. 21 Q. In June of 2020, were you being encouraged by 22 former President Trump to run for governor of Minnesota? 23 A. No. That meeting there, that particular 24 meeting was all his media people. He had me there to 25 critique their ads. So the -- Pence was in the room and</p>
<p style="text-align: right;">Page 58</p> <p>1 voted on by the board, so... 2 Q. In 2020, what percentage of shares of MyPillow 3 did you own? 4 A. Probably 50 and a half percent or 51. 5 Q. How about 2021? 6 A. Same thing. 7 Q. 2022? 8 A. Same thing. 9 Q. So have you owned somewhere around 50 to 10 50.5 percent of MyPillow shares from 2020 through 11 present? 12 A. Correct. 13 Q. Okay. And who is the second -- let me just ask 14 you this: Who owns the second most amount of shares of 15 MyPillow? 16 A. No idea. It would be some of the employees. I 17 have absolutely no idea. Probably ten of them, anywhere 18 from 3 to 5 percent. After that, it's -- it could be 50 19 to 100 of them own different amounts. 20 Q. Going back to Exhibit 590, the text between -- 21 A. You mean you guys didn't study all the people 22 you're going to hurt or trying to hurt? 23 MS. WRIGLEY: I'm going to move to strike. 24 It's nonresponsive. 25 Q. (BY MS. WRIGLEY) Mr. Lindell, do you see this</p>	<p style="text-align: right;">Page 60</p> <p>1 all these ad people, and as we were doing ads, they 2 had -- they had a -- they -- a commercial made for 3 Minnesota, and it showed all the burning in Minnesota 4 where they burned up Minneapolis. 5 And the president came in. He had read my 6 book. And then Pence said -- I think made the comment, 7 "Well, you should run for governor of Minnesota. Look 8 what's happening there, the horrific streets burning up 9 because of the riots." That's what this comment was 10 about. The two and a half hours wasn't just me and 11 Pence. It was all media people for these commercials. 12 Q. Okay. And -- 13 A. That's when that governor thing got brought up. 14 Q. And you mentioned it in the text message to Kim 15 Rasmussen? 16 A. Yes. 17 Q. I'm done with that document, sir. I'll show 18 you another one. This will be 591. 19 (Exhibit 591 marked.) 20 Q. (BY MS. WRIGLEY) This is 591. For the record, 21 this is a text chain between Mr. Lindell and Corey 22 Lewandowski, produced as DEF 036030. This one, like the 23 rest of them, is long. It's 54 pages. This particular 24 DEF exhibit includes only Page 1, Page 6 and Page 7. 25 A. Uh-huh.</p>

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<p style="text-align: right;">Page 61</p> <p>1 Q. Do you see at the top, sir, this text chain 2 starts on June 28, 2020?</p> <p>3 A. Correct.</p> <p>4 Q. It's between yourself and Corey Lewandowski, 5 correct?</p> <p>6 A. Correct.</p> <p>7 Q. Who is Mr. Lewandowski?</p> <p>8 A. He worked for the president. He was doing 9 campaign stuff in Minnesota, I think, and South Dakota.</p> <p>10 Q. He worked for President Trump?</p> <p>11 A. Worked for President Donald Trump, yes --</p> <p>12 Q. Okay.</p> <p>13 A. -- as far as I know.</p> <p>14 Q. Okay. And then I think you said South -- you 15 said Minnesota?</p> <p>16 A. I don't know what this -- he was -- I know I've 17 seen him in Minnesota. He was there. South Dakota. He 18 was all over back then.</p> <p>19 Q. I'm going to direct your attention to the 20 second page of this document, which is the Page 6 of the 21 produced document. Do you see at the top there's a date 22 October 17, 2020?</p> <p>23 A. Okay.</p> <p>24 Q. You write to him, "Great job on Hannity. 25 Thanks for bringing up Minnesota. You are correct, we</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. Mr. Lindell, you wrote, "I think I texted 2 everyone in the campaign complaining about not running 3 this ad" --</p> <p>4 A. Right.</p> <p>5 Q. -- "we made for MN this last two weeks..."</p> <p>6 A. Yes.</p> <p>7 Q. "They finally gave in and are running it like 8 crazy. I guess it pays to complain."</p> <p>9 A. Yeah.</p> <p>10 Q. Do you see that?</p> <p>11 And then you sent an attachment, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And then you also said, "They were ready to 14 give up...I could feel it by their crickets every time I 15 asked when they were starting. We are going to win 16 Minnesota!!!!" Correct?</p> <p>17 A. Yeah.</p> <p>18 Q. Mr. Lewandowski responds, "We need to win. He 19 wants to win MN." Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. You responded, correct, sir?</p> <p>22 A. Yes.</p> <p>23 Q. You said, "We win, I'm all in on governor."</p> <p>24 A. That's correct. That's what I told you earlier 25 in this deposition. That's when I really was</p>
<p style="text-align: right;">Page 62</p> <p>1 will win MN!" Do you see that?</p> <p>2 A. Uh-huh.</p> <p>3 Q. He responded to you, correct?</p> <p>4 A. Where he said, "I want to win it so bad. Don't 5 let the boss give up on it."</p> <p>6 Q. Yes. Do you see that, sir?</p> <p>7 A. Yeah.</p> <p>8 Q. And did you understand the reference to "the 9 boss" to be President Trump?</p> <p>10 A. Yeah. He calls him "the boss," yeah.</p> <p>11 Q. And then you responded by including a Breitbart 12 article with the title, "MyPillow's Mike Lindell 13 predicts Trump Minnesota victory, first-time GOP top 14 ticket state since 1972." Do you see that?</p> <p>15 A. Correct.</p> <p>16 Q. And then there's a picture of you and a 17 Breitbart symbol at the bottom, correct?</p> <p>18 A. Yeah. I don't know where you got the picture, 19 but yes.</p> <p>20 Q. Okay. And then if you go to the next page, 21 Page 7, Mr. Lewandowski responds, "Boom. Agree," 22 correct?</p> <p>23 A. Yeah.</p> <p>24 Q. And then you responded to him, correct?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 64</p> <p>1 considering it, right towards the end of 2020.</p> <p>2 Q. So towards the end of 2020, you were seriously 3 considering running for Minnesota, correct?</p> <p>4 A. No. That's when I was really considering.</p> <p>5 Before, it was all chatter. It became very real then -- 6 by then. The stuff, especially after the riots, when I 7 watched my city get destroyed where I grew up on those 8 streets.</p> <p>9 Q. Around this time in October of 2020, were you 10 considering whether to announce your run for governor of 11 Minnesota after the 2020 presidential election?</p> <p>12 A. Yes. Yeah, it was sometime -- it wasn't up 13 until 2022.</p> <p>14 Q. Okay. I'm going to hand you another document, 15 sir. This one will be 592.</p> <p>16 (Exhibit 592 marked.)</p> <p>17 Q. (BY MS. WRIGLEY) For the record, this is a 18 document produced DEF 082786. Once again, it's a text 19 chain. This one is between Mike Lindell and Mary. It's 20 a long one. This chain has Pages 1, 106 through 110 21 included. And then for the record, the black on the top 22 is the way in which it was produced by defense counsel 23 to us.</p> <p>24 Mr. Lindell, looking at the top, do you see 25 this is a text between yourself and somebody named Mary?</p>

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<p style="text-align: right;">Page 65</p> <p>1 A. Uh-huh.</p> <p>2 Q. Who is Mary?</p> <p>3 A. Cousin, first cousin.</p> <p>4 Q. What's her last name?</p> <p>5 A. Glasnapp. Glasnapp. Glasnapp.</p> <p>6 Q. Will you spell it for the record?</p> <p>7 A. I don't know. G-L-A-S-N-A-P-P.</p> <p>8 Q. Thank, you sir. I'm going to have you skip</p> <p>9 ahead.</p> <p>10 MR. KACHOUROFF: What page?</p> <p>11 MS. WRIGLEY: Yeah.</p> <p>12 Q. (BY MS. WRIGLEY) So if you look on Page 106,</p> <p>13 the second page of the exhibit, do you see at the top</p> <p>14 the date is October 28, 2020? Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And that's a few days before the presidential</p> <p>17 election in 2020, correct?</p> <p>18 A. Right.</p> <p>19 Q. Mary says, "How was Bemidji"?</p> <p>20 A. Yeah.</p> <p>21 Q. "Was there a big crowd?" Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. You respond, "Yes. I spoke in Wisconsin</p> <p>24 today," and then there was an image. Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 67</p> <p>1 running for governor in 2022, possible president in</p> <p>2 2024. The president and I are going to announce me</p> <p>3 running right after the election, thumbs up"? Do you</p> <p>4 see that?</p> <p>5 A. Yes.</p> <p>6 Q. You say, "Seven days...keep praying." Do you</p> <p>7 see that?</p> <p>8 A. Yes.</p> <p>9 Q. And at this point in time, you were considering</p> <p>10 running for governor in 2022?</p> <p>11 A. Uh-huh. A hundred percent.</p> <p>12 Q. A hundred per- --</p> <p>13 A. At that time, I was very serious of running for</p> <p>14 governor.</p> <p>15 Q. And were you considering a possible run for</p> <p>16 president in 2024?</p> <p>17 A. I know I put it on there, but I wasn't -- it</p> <p>18 was -- it wasn't on my mind, it was all about governor.</p> <p>19 This was all after the riots, after that all happened,</p> <p>20 and I thought that I could do something to maybe fix</p> <p>21 this in Minnesota.</p> <p>22 Q. Okay. You can put that aside, and I'm going to</p> <p>23 show you another document, sir.</p> <p>24 (Exhibit 593 marked.)</p> <p>25 Q. (BY MS. WRIGLEY) This is 593. For the record,</p>
<p style="text-align: right;">Page 66</p> <p>1 Q. And do you recall what this speech in Wisconsin</p> <p>2 was around this time?</p> <p>3 A. Just rallies.</p> <p>4 Q. Rallies for Trump?</p> <p>5 A. I don't know. I do some myself. I do -- I</p> <p>6 would speak. That looks like a Trump rally, no?</p> <p>7 Q. If you look at Page 107, do you think -- do you</p> <p>8 see there's another attachment that has a picture image</p> <p>9 of Trump at a podium?</p> <p>10 A. Yeah. I don't know if it was the same one or</p> <p>11 not, but if it was, it was a rally in Wisconsin.</p> <p>12 Q. And if you look at Page 108, do you see there's</p> <p>13 another picture of you at what appears to be rally?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Mary responds on that page, "Good. Keep raking</p> <p>16 in the voters." Do you see that?</p> <p>17 A. Uh-huh. Yes.</p> <p>18 Q. And then if you go to the next page, Page 109,</p> <p>19 do you see there's an image of you and President Trump</p> <p>20 in the Oval Office at the White House? And Mary</p> <p>21 responds, "Nice"?</p> <p>22 A. Yeah.</p> <p>23 Q. If you go to Page 110, this is on the same</p> <p>24 date, do you see that -- below a picture of you and</p> <p>25 President Trump, you write to Mary, "Tell Mark I am</p>	<p style="text-align: right;">Page 68</p> <p>1 this was produced DEF 083932. It's a text chain between</p> <p>2 Mike Lindell and Michelle Media, Katelyn Gamlin. The</p> <p>3 first page was produced with redaction. This is part of</p> <p>4 a longer text chain. This particular Exhibit 593 only</p> <p>5 includes Page 1, 19 and 20 from that document.</p> <p>6 Mr. Lindell, do you see this is, at the</p> <p>7 top, a text message between yourself, Michelle Media and</p> <p>8 Katelyn Gamlin?</p> <p>9 A. Correct.</p> <p>10 Q. Who is Katelyn Gamlin?</p> <p>11 A. She was -- she was my executive assistant.</p> <p>12 Q. Was she your executive assistant in 2020?</p> <p>13 A. I think so. Probably.</p> <p>14 Q. 2021?</p> <p>15 A. Yes.</p> <p>16 Q. And how long has Ms. Gamlin been working as</p> <p>17 your executive assistant?</p> <p>18 A. I don't know. Since maybe 2020, 2019,</p> <p>19 somewhere in there.</p> <p>20 Q. Is she still your executive --</p> <p>21 A. Yes.</p> <p>22 Q. -- assistant today?</p> <p>23 A. Yes.</p> <p>24 Q. Michelle Media, do you know who that is?</p> <p>25 A. Yeah. She's a -- she does -- she's a PR. At</p>

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<p style="text-align: right;">Page 69</p> <p>1 one time, she -- she was my -- we hired her firm to be a</p> <p>2 PR firm back with MyPillow when I do media appearances.</p> <p>3 I actually -- they actually got rid of her after -- I</p> <p>4 think it was sometime in '18 or '19. I just didn't feel</p> <p>5 I needed the cost. But that's what that is. It's a</p> <p>6 media reporter.</p> <p>7 Q. If you go to the second page, which is Page 19</p> <p>8 of this produced document, do you see a date at the</p> <p>9 bottom November 6, 2020?</p> <p>10 A. Uh-huh.</p> <p>11 Q. And do you see Michelle Media texts, "Hi, Mike.</p> <p>12 A Fox Business reporter reached out asking about whether</p> <p>13 you are running for governor in 2022. What are you</p> <p>14 currently saying about that? No decision until after</p> <p>15 the presidential election?" Do you see that?</p> <p>16 A. Yeah.</p> <p>17 Q. And you responded, "Correct"?</p> <p>18 A. That's right.</p> <p>19 Q. And was that correct at the time?</p> <p>20 A. Yeah.</p> <p>21 Q. This is in November of 2020?</p> <p>22 A. Yeah.</p> <p>23 Q. After the presidential election in November of</p> <p>24 2020, were you fielding inquiries from the media about</p> <p>25 whether you were going to run for governor of Minnesota?</p>	<p style="text-align: right;">Page 71</p> <p>1 first elected to the White House?</p> <p>2 A. I have no idea. I -- I didn't know Bannon</p> <p>3 until 2021.</p> <p>4 Q. Mr. Bannon has a podcast called War Room,</p> <p>5 correct?</p> <p>6 A. That's correct.</p> <p>7 Q. Do you see that this text chain starts on</p> <p>8 February 18, 2021?</p> <p>9 A. Correct.</p> <p>10 Q. I'm going to jump ahead and ask you about</p> <p>11 something that is on -- let me just walk you through it.</p> <p>12 I'm going to start with the second page,</p> <p>13 Page 28, of the document. Do you see in the middle of</p> <p>14 the page there's the date March 15, 2021?</p> <p>15 A. Okay.</p> <p>16 Q. Mr. Bannon writes to you, "I just read the</p> <p>17 article. Don't think it's all" -- "it's bad at all."</p> <p>18 Do you see that?</p> <p>19 A. Yeah.</p> <p>20 Q. Mr. Lindell, you responded, "It's all the lies</p> <p>21 and stuff they left out. This article got more</p> <p>22 complaints from people I know than all of the ones this</p> <p>23 year out together." Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Mr. Bannon responds to you, "Let's go through,</p>
<p style="text-align: right;">Page 70</p> <p>1 A. After the election?</p> <p>2 Q. Yes, sir.</p> <p>3 A. No. My focus was far away from -- my focus was</p> <p>4 on one thing, looking at states and seeing why people</p> <p>5 voted in states that didn't live there. That was my</p> <p>6 number one thing every day from the day of the -- the</p> <p>7 day of -- from November 4th on. I never gave Minnesota</p> <p>8 governor one thought after that day.</p> <p>9 Q. Okay. I'm going to mark another document, sir.</p> <p>10 (Exhibit 594 marked.)</p> <p>11 Q. (BY MS. WRIGLEY) This is 594. Once again,</p> <p>12 this is a text chain. This one was produced DEF 081585.</p> <p>13 This one produced was particularly long, 272 pages.</p> <p>14 This is -- just includes a number of excerpts for pages,</p> <p>15 Pages 1 and 28 through --</p> <p>16 A. Yeah.</p> <p>17 Q. -- 38, sir.</p> <p>18 Do you see at the top this is a text chain</p> <p>19 between yourself and Steve Bannon?</p> <p>20 A. Correct.</p> <p>21 Q. Who is Steve Bannon, sir?</p> <p>22 A. He's -- he's a host on War Room. He was the</p> <p>23 president's -- our real president's advisor I think in</p> <p>24 '16.</p> <p>25 Q. Did Mr. Bannon help to get President Trump</p>	<p style="text-align: right;">Page 72</p> <p>1 but they have some great stuff in there about the</p> <p>2 employees and how you run the company." Do you see</p> <p>3 this?</p> <p>4 A. Yes.</p> <p>5 Q. And then if you go to the next page, you</p> <p>6 responded, "No, they actually minimized that too and</p> <p>7 lied." Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Mr. Bannon responded, "For a super progressive</p> <p>10 paper, it's not that bad."</p> <p>11 A. Yes.</p> <p>12 Q. "You come off as a decent guy to those who work</p> <p>13 for you. We can pump up." Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. What was he referring to with the reference,</p> <p>16 "We can pump up"?</p> <p>17 A. I -- I don't know the article -- I don't know</p> <p>18 the article he's referring to. He's probably -- he's</p> <p>19 pumping up MyPillow because MyPillow at that time was</p> <p>20 getting cancelled by every single box store in the</p> <p>21 country. We were losing hundreds of millions of</p> <p>22 dollars, we lost in a three-week period, and he was</p> <p>23 trying to help at that time coming on and saying -- you</p> <p>24 know, help my employees, and that's what he's talking</p> <p>25 about, pump up the company, that we're -- you know,</p>

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<p style="text-align: right;">Page 73</p> <p>1 they're destroying our company, that -- that -- for no 2 reason, you know. 3 Q. Now, if you go down in text, you see in this 4 text chain between you and Mr. Bannon, at the bottom you 5 say, "I can explain why this one upset me more than all 6 the others put together and how the left does it well." 7 Do you see that? 8 A. Uh-huh. 9 Q. And Mr. Bannon responds, "Okay." Do you see 10 that? 11 A. Uh-huh. 12 Q. Now, on the next page, he responds -- I'm on 13 Page 30 of this produced exhibit -- "They are obsessed 14 with you running for governor." Do you see that? 15 A. Yes. 16 Q. You responded, correct? 17 A. Yes. There -- that was the time -- Governor 18 Walz in Minnesota, after we had went around many times 19 with him, I had masks that I made for the country, and 20 there's a whole thing of me and the governor of 21 Minnesota going back and forth battling all the time. 22 He would not accept the free masks. And this was after 23 the election. Things like that. 24 But what he did in that -- what Bannon's 25 referring to here, he sent out flyers all over</p>	<p style="text-align: right;">Page 75</p> <p>1 and run for president if Trump doesn't run in '24." Do 2 you see that? 3 A. Yeah. 4 Q. Did Mr. Bannon talk to you about running for 5 president -- 6 A. No. 7 Q. -- in 2021? 8 A. No. No. 9 Q. Never? 10 A. No, not that I know of. That was -- I just met 11 the guy around this time. 12 Q. Now, if you go to Page 31, at the top, do you 13 see it's an image? And is that the -- 14 A. Uh-huh. 15 Q. -- ad that you were referring to when you 16 testified a few minutes ago? 17 A. Hey, there's -- you guys found the flyer I just 18 told you about. See. Huh, it's all true. Wow. You 19 found that for me. I was looking for that. That's 20 exactly the flyer he sent out all over Minnesota. 21 Q. Mr. Bannon responded to you sending that 22 attachment. Do you see that? 23 A. Yeah. 24 Q. Mr. Bannon, Steve Bannon says, "This is great. 25 First, it's a great photo, power photo, and you can</p>
<p style="text-align: right;">Page 74</p> <p>1 Minnesota, millions of dollars worth, I think, and with 2 my picture on them, and said, "Do you want this guy 3 being your governor, another Trump-like person?" 4 And that's what your answer is referring 5 to, that I'm referring to, they're very afraid. I go -- 6 I wasn't even going to run then, and they were afraid 7 that I -- because I hadn't said anything. I was focused 8 on getting rid of the electronic voting machines and 9 going to paper ballots by that time, as you know. 10 Q. Did you -- in 2021, did you have any 11 discussions with Steve Bannon about potentially running 12 for governor -- 13 A. No. 14 Q. -- in Minnesota? 15 A. No. 16 Q. Not a single conversation? 17 A. Not that I'm aware of. I -- that was the 18 furthest thing from my mind. I was all about getting 19 rid of electronic voting machines and going to paper 20 ballots and counting. That was my whole focus 18 hours 21 a day for the next three years. 22 Q. Now, Mr. Bannon responded to you and said, "Of 23 course. Petrified." 24 A. Yeah. 25 Q. And then he said, "I would hold off on governor</p>	<p style="text-align: right;">Page 76</p> <p>1 smell the fear." 2 A. Right. 3 Q. Do you see that? 4 A. Yeah. 5 Q. And, Mr. Lindell, you responded, "We can play 6 that up, smiley face. I'm landing soon." 7 A. Right. 8 Q. Do you see that? 9 A. Yeah. 10 Q. And then if you go to the next page, do you see 11 that Mr. Bannon says, "K. I'm up working. Call when 12 free"? Do you see that? 13 A. Yeah. 14 Q. You responded, Mr. Lindell, "Did I tell you I 15 hired Alan Dershowitz, too," correct? 16 A. Right. 17 Q. Mr. Bannon responds, "Yes, that's" -- 18 A. And for the record, can I say Alan Dershowitz 19 still owes me money, and he's a bad guy? 20 Go ahead. 21 Q. And Mr. Bannon responded, "Yes, that's huge. 22 And he interviewed and they didn't print a word." Do 23 you see that? 24 A. Yeah. 25 Q. Mr. Lindell, you responded, "I think I have 12</p>

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<p style="text-align: right;">Page 77</p> <p>1 lawyers now and hired the biggest investigators to find</p> <p>2 all the troll and bot groups and who hired them."</p> <p>3 A. Correct.</p> <p>4 Q. Do you see that?</p> <p>5 A. Yeah.</p> <p>6 Q. Mr. Bannon says, "Brilliant. We have to be</p> <p>7 getting all this on film, like a reality TV so we can</p> <p>8 make a documentary film." Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And you responded, Mr. Lindell?</p> <p>11 A. "For sure. Remind me to tell about Swin."</p> <p>12 Q. And who's Swin?</p> <p>13 A. Swin is a reporter for The Daily Beast. He now</p> <p>14 works for the Rolling Stone magazine. He doesn't like</p> <p>15 to say he's still with The Daily Beast.</p> <p>16 But of all the reporters that attacked me</p> <p>17 every day for three days, I became kind of weird friends</p> <p>18 with Asawin, Swin was one of them. He would bash me</p> <p>19 every day in articles, but at least he would -- he would</p> <p>20 let me say my voice of what I had to say, and people</p> <p>21 would read through the bashing.</p> <p>22 Q. Now, Mr. Bannon had referred to a documentary</p> <p>23 film. Do you know what that was a reference to?</p> <p>24 A. I had no idea.</p> <p>25 Q. Now, if you go to Page 33, at the top,</p>	<p style="text-align: right;">Page 79</p> <p>1 Q. And is that an image for "Frank, the voice of</p> <p>2 free speech"?</p> <p>3 A. Yeah. We were trying to -- this is when I</p> <p>4 first wanted to get the company -- this goes to when I</p> <p>5 came out with the show, the "Absolute Proof" on</p> <p>6 February 5, 2021, the media went completely silent on me</p> <p>7 for about 16 days, and that scared me that I would never</p> <p>8 be able to get the word out about the machine companies</p> <p>9 and what I had found and what had been brought to me.</p> <p>10 And so I had to come up with my own media</p> <p>11 platform, and I first got the name VOCL, V-O-C-L, and</p> <p>12 they stopped that. They, of course, had stopped it.</p> <p>13 They attacked me.</p> <p>14 And so then we went and got -- the name</p> <p>15 "Frank" was available and FrankSpeech. That was one of</p> <p>16 our first original logos.</p> <p>17 Q. And you discussed the name for that platform</p> <p>18 with Steve Bannon?</p> <p>19 A. What's that?</p> <p>20 Q. You discussed the name for that platform with</p> <p>21 Steve Bannon?</p> <p>22 A. No. This is the text. I didn't call up Steve</p> <p>23 Bannon. I didn't know Steve Bannon very well then. I</p> <p>24 had just met him in February. I had probably told him I</p> <p>25 was going to have a new platform, but then it was</p>
<p style="text-align: right;">Page 78</p> <p>1 Mr. Bannon says, "The different teams would be</p> <p>2 fascinating, plus a film crew on you." Do you see that?</p> <p>3 A. Yeah.</p> <p>4 Q. You responded, "He heard us on your</p> <p>5 show...LOL." Do you see that?</p> <p>6 A. Yeah.</p> <p>7 Q. And is that a reference to the reporter, Swin?</p> <p>8 A. Sure. Yeah.</p> <p>9 Q. Okay. Mr. Bannon responded, "LOL," correct?</p> <p>10 A. Yes.</p> <p>11 Q. And then you and Mr. Bannon go back and forth</p> <p>12 about the Swin report, correct?</p> <p>13 A. Yeah. He -- everybody knows Swin.</p> <p>14 Q. And Mr. Bannon thought Swin was whiney?</p> <p>15 A. What's that? Yeah, he is whiney.</p> <p>16 Q. He was very whiney?</p> <p>17 A. Yeah.</p> <p>18 Q. Now, if you go to the next page, do you see</p> <p>19 that Mr. Bannon starts off, "LOL!!"? Do you see that?</p> <p>20 A. Yeah.</p> <p>21 Q. And, Mr. Lindell, you responded, "Frank means</p> <p>22 free, forthright and sincere speech."</p> <p>23 A. That's right.</p> <p>24 Q. Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 80</p> <p>1 just a -- it was just a -- I think FrankSpeech started</p> <p>2 in, I want to say, March or April of 2021.</p> <p>3 Q. Mr. Bannon responded here saying, "It's a power</p> <p>4 name. Let me be, quote, frank, end quote."</p> <p>5 A. Yeah. He was asking my opinion about the name.</p> <p>6 I didn't -- probably didn't even tell him about the</p> <p>7 platform.</p> <p>8 Q. He continued in the text, "Frank, the power of</p> <p>9 free speech."</p> <p>10 A. Right.</p> <p>11 Q. "Frank, the impact by free speech. Frank, the</p> <p>12 platform for speech" -- "free speech."</p> <p>13 A. Right.</p> <p>14 Q. Do you see that?</p> <p>15 A. I was -- the name did -- I mean, it was weird</p> <p>16 to me because, quite frankly, I was speaking frankly --</p> <p>17 Q. Right.</p> <p>18 A. -- but we had to come up with something.</p> <p>19 Q. In 2021, did you discuss building out a media</p> <p>20 platform to help launch your political career with Steve</p> <p>21 Bannon in preparation for future run for office?</p> <p>22 A. No. Absolutely not.</p> <p>23 Q. In 2021, did Steve Bannon communicate with you</p> <p>24 at all about building your political apparatus?</p> <p>25 A. What political apparatus? No. That was --</p>

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<p style="text-align: right;">Page 81</p> <p>1 absolutely not. I was not focused on any run for office</p> <p>2 after the 2020 election. It was not my focus. It was a</p> <p>3 hundred percent to get rid of the electronic voting</p> <p>4 machines in our elections, hundred percent, 18 hours a</p> <p>5 day nonstop.</p> <p>6 Q. In 2021, did Steve Bannon present you with any</p> <p>7 sort of a plan to run for political office?</p> <p>8 A. No. No. No.</p> <p>9 Q. Have you communicated -- have you continued to</p> <p>10 communicate regularly with Steve Bannon from 2021 up</p> <p>11 through the present?</p> <p>12 A. Yeah. I go on his show and podcast just like I</p> <p>13 do 400 prior to these elections, prior to '16. He has</p> <p>14 the same business format we've used since 2011 -- or</p> <p>15 2010 on -- I do it on War Room now. I'm on there</p> <p>16 probably twice a day on one of -- he has four shows. I</p> <p>17 do it at least on one or twice where I do MyPillow.</p> <p>18 Q. I want to have you skip forward a little bit</p> <p>19 and go to Page 37, sir.</p> <p>20 MR. KACHOUROFF: Still on Exhibit 594?</p> <p>21 MS. WRIGLEY: Yes.</p> <p>22 Q. (BY MS. WRIGLEY) And actually, if you go to</p> <p>23 36, because that's the page that has the date, do you</p> <p>24 see the date in the middle of the page is March 16,</p> <p>25 2021? Are you there on Page 36, sir?</p>	<p style="text-align: right;">Page 83</p> <p>1 about the election platforms and -- and then also, he</p> <p>2 also had some MyPillow ads that I had to do. And what</p> <p>3 he did there, he did the interview so long that the</p> <p>4 whole spot was missed for MyPillow. So...</p> <p>5 Q. Now, you responded, "LOL," correct?</p> <p>6 A. Yeah.</p> <p>7 Q. 37, you also said, "You did one. Sales were</p> <p>8 lower though...around 45K. It was a good show. Swin</p> <p>9 has become a big fan of your show, Emoji."</p> <p>10 A. Uh-huh.</p> <p>11 Q. "He texts me questions whenever I am off the</p> <p>12 air now...LOL."</p> <p>13 A. Right.</p> <p>14 Q. Do you see that?</p> <p>15 A. Yep.</p> <p>16 Q. Mr. Bannon responds, "LOL. Slippers are</p> <p>17 amazing," correct?</p> <p>18 A. Yes.</p> <p>19 Q. You responded with a thumbs up, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Mr. Bannon then responds, "We also need to talk</p> <p>22 later. You can't run for governor. You work your tail</p> <p>23 off to help take back the House in '22. You have to</p> <p>24 wait till 2024 and see if President Trump runs for</p> <p>25 reelection - if he chooses not to, then you run for the</p>
<p style="text-align: right;">Page 82</p> <p>1 A. What's that? Yes.</p> <p>2 Q. On Page 36, do you see the date is --</p> <p>3 A. 36?</p> <p>4 Q. Yes. March 16, 2021?</p> <p>5 A. Yep.</p> <p>6 Q. Mr. Bannon texted you, "Saw you called and</p> <p>7 called you back." Do you see that?</p> <p>8 A. Yeah.</p> <p>9 Q. And it's at 1:00 a.m., I think. Do you see</p> <p>10 that?</p> <p>11 A. Yep.</p> <p>12 Q. And you respond, "All good," correct?</p> <p>13 A. Yep.</p> <p>14 Q. Mr. Bannon responds, "You knocked it out of the</p> <p>15 park today. I got so into the interview that I forgot</p> <p>16 to read the MyPillow spots."</p> <p>17 A. Right.</p> <p>18 Q. Do you see that?</p> <p>19 A. Yeah.</p> <p>20 Q. And would that have been referring to an</p> <p>21 interview that you did on Steve Bannon's show?</p> <p>22 A. Yeah. There was two things going on with</p> <p>23 Bannon. Just like any other show, except for Fox and</p> <p>24 NewsMax, because of lawfare, they would not have me on,</p> <p>25 or sale of media. So when I would go on there and talk</p>	<p style="text-align: right;">Page 84</p> <p>1 presidency." Do you see that?</p> <p>2 A. Yeah.</p> <p>3 Q. And then if you go to the next page,</p> <p>4 Mr. Lindell, you responded, correct? Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Mr. Lindell, you texted, "I have thought of</p> <p>7 that, and also, if he is reinstated on August, like I</p> <p>8 believe he will be, then 2024 looks very real, thumbs</p> <p>9 up." Do you see that?</p> <p>10 A. Right.</p> <p>11 Q. Mr. Bannon responds, "Mike, I'm very serious</p> <p>12 about this. Let's set aside time" -- "let's set some</p> <p>13 time aside to get a plan. This is God's work." Do you</p> <p>14 see that?</p> <p>15 A. Yeah.</p> <p>16 Q. And, Mr. Lindell, you said, "I am too...I just</p> <p>17 never wanted to say anything yet."</p> <p>18 A. Yeah.</p> <p>19 Q. Do you see that?</p> <p>20 A. Yeah.</p> <p>21 Q. Mr. Bannon says, "You cannot mention this to</p> <p>22 anyone. Only focus on '22, why we run the tables, all</p> <p>23 the while building your political apparatus." Do you</p> <p>24 see that?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 85</p> <p>1 Q. And, Mr. Lindell, you responded, "Believe me, I 2 haven't...huge amount of people tell me to do just that 3 all the time," correct? 4 A. Yes. Yes. 5 Q. Now, you understand that Mr. Bannon is a strong 6 supporter of President Trump? 7 A. Yeah. He's -- and he's got -- he's very 8 opinionated of what his strategy for the whole country 9 is, believe me. 10 Q. And you've continued to communicate with 11 Mr. Bannon and appear on his show regularly through 2021 12 through the present, correct? 13 A. Yeah. Mostly for -- 95 percent for MyPillow 14 ads. He's an advertiser just like everybody else. 15 Q. Are you aware that Mr. Bannon was convicted on 16 a contempt charge for refusing to comply with a subpoena 17 for the January 6th Committee? 18 A. Yeah. And I didn't get to come to that. They 19 wouldn't -- I tried to get to come to that to show all 20 the evidence, but they wouldn't let me come. It was 21 disgusting. 22 Q. There was a trial over -- Mr. Bannon had a 23 trial over that contempt charge, correct? 24 A. What's that? 25 Q. Mr. Bannon had a trial over that contempt</p>	<p style="text-align: right;">Page 87</p> <p>1 Q. Does he have one of the highest revenue splits? 2 A. No. It's all the same across the board. 3 Nobody is favored. 4 Q. Okay. But he does -- in terms of sales of 5 MyPillow products that use a promo code that he gives 6 out on his War Room podcast, some of those proceeds go 7 to MyPillow and some of those proceeds go to Mr. Bannon, 8 correct? 9 A. You pay for ads, that's correct. You have to 10 pay this ad company to -- you pay for -- it's -- what we 11 have at MyPillow, it's been the same since 2010. Back 12 in 2010 when we got into radio, the first one, I 13 believe, was sale of media where people -- you paid for 14 your ads. 15 And I said, well, you know, what -- if you 16 have all these impressions, why don't we do a rev share? 17 I would -- first said, if you have all these people, 18 let's do a rev share, then I have no risk. And we 19 changed the whole industry from iHeartMedia, Salem 20 Media, Cumulus. All of them -- most of all of them now 21 are on rev shares, instead of buying the ads directly. 22 There's still a few direct ones, like, I 23 don't know, Glenn Beck maybe, Hannity. Back then, 24 Hannity started in '15, that you still paid -- paid out, 25 just paid directly for the ads.</p>
<p style="text-align: right;">Page 86</p> <p>1 charge, correct? 2 A. Yeah. I wasn't familiar with it back then. I 3 know -- I know he's just got in the news today that 4 he's -- that they say he should really have to do some 5 jail time. Is that what you're talking about? 6 Q. And do you understand what the charges were 7 against Mr. Bannon? 8 A. No. I didn't follow it. 9 Q. Okay. Do you understand that there was a jury 10 trial? 11 A. I didn't follow it. 12 Q. Okay. 13 A. I have no idea. 14 Q. Does MyPillow have an agreement with Steve 15 Bannon to split revenue based on a percentage from any 16 sales of MyPillow products that use a promo code that he 17 gives out on his War Room podcast? 18 A. Yes, that and 500 other pro -- 500 other at 19 least, going all the way back to 2010. Includes radio, 20 all TV, print, everything. 21 Q. What's the revenue split in terms of that 22 agreement with Mr. Bannon? 23 A. I don't know. I don't know the exact 24 agreement. There's different ones with different 25 podcasters.</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Is Steve Bannon one of MyPillow's best 2 advertisers? 3 A. I wouldn't say that. They're all the same, you 4 know. 5 Q. Is he one of the highest performing advertisers 6 in terms of sales of MyPillow products? 7 A. He's in the upper third, I would say. You 8 know, it depends if you're talking -- if you're talking 9 TV, no, then he's not. If you're talking -- in the TV, 10 he'd be one of the lowest ones. If you're talking 11 podcasters, he'd be one of the highest ones. He's kind 12 of a mix. Steve's kind of a mix. Just Real America's 13 Voice, that's on TV. With TV, he would be one of the -- 14 probably the lower ones. But podcast, he'd be one of 15 the highest. 16 Q. Okay. So he would be one of the top 17 advertisers in terms of sales of MyPillow products in 18 the podcast world? 19 A. In the podcast world. There's about four that 20 are equal probably. 21 Q. Now, in terms of TV, who are the top 22 advertisers for MyPillow products? 23 A. It was Fox News, NewsMax. Until their ratings 24 went down, CNN was almost tied with Fox. And MSNBC, 25 ABC, CBS, all of them, all the broadcasts, ABC, CBS,</p>

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<p style="text-align: right;">Page 89</p> <p>1 NBC. But now since that -- with the shift -- because</p> <p>2 it's all about what we pay. We don't advertise -- if</p> <p>3 he -- here's the way our ads work. If -- for every</p> <p>4 spot, it's tracked by a promo code or a phone number.</p> <p>5 Let's say it's CNN. At 3:00 o'clock in the morning, if</p> <p>6 it costs \$1,000, you better break even or a make little</p> <p>7 bit or we never run it again. So it's all about what</p> <p>8 you pay and what you get back.</p> <p>9 Let's say you had to live on that exact ad.</p> <p>10 What happened was after -- after the -- when the China</p> <p>11 virus came in, finally, CNN's ads were down in price,</p> <p>12 and MSNBC, they came down in price, so we were able to</p> <p>13 advertise on there again. It's all about what you pay</p> <p>14 and what you get back.</p> <p>15 So when you see a lot of MyPillow ads, that</p> <p>16 means we're either breaking even or making money on that</p> <p>17 particular ad. So it all --</p> <p>18 Q. Let me ask --</p> <p>19 A. -- changes is what I'm saying. It depends what</p> <p>20 the stations charge.</p> <p>21 Q. Let me ask you this: In terms of Fox News,</p> <p>22 that's a TV advertisement, correct?</p> <p>23 A. Yeah.</p> <p>24 Q. Is there a revenue split agreement with Fox</p> <p>25 News or do you pay for spots?</p>	<p style="text-align: right;">Page 91</p> <p>1 the -- and when you get into the NBCs and CBSs and that,</p> <p>2 some of them are on rev shares.</p> <p>3 Q. Okay.</p> <p>4 A. It's different. They call it something else.</p> <p>5 They call it guaranteed media. In other words, they do</p> <p>6 the ads and they get a percentage of sales. It's kind</p> <p>7 of the same thing. It's like -- they -- they'll run it</p> <p>8 and -- they can run it -- well, they consider it as a</p> <p>9 rev share base. They can run as many spots as they want</p> <p>10 because they don't have -- they get a percentage of</p> <p>11 every sale. So it is a rev share. They just name it</p> <p>12 something else. I can't -- I forget what it's called</p> <p>13 right now.</p> <p>14 Q. In terms of the paid TV specs, do you -- for</p> <p>15 MyPillow, is that considered an advertising cost?</p> <p>16 A. Yeah.</p> <p>17 Q. And then in terms of the revenue splits for</p> <p>18 MyPillow, is that considered an advertising cost?</p> <p>19 A. Absolutely. They're identical.</p> <p>20 Q. Okay. And then let's just say for 2023, how --</p> <p>21 approximately how much did advertising cost MyPillow for</p> <p>22 that year?</p> <p>23 A. 2020 -- I have no idea. It's our advertising</p> <p>24 cost. Like I say, we don't brand, so if -- in 2023 -- I</p> <p>25 know we lost millions of dollars in 2022. It was -- you</p>
<p style="text-align: right;">Page 90</p> <p>1 A. You pay for spots. Like I said, each</p> <p>2 individual spot, and if that doesn't make us money, we</p> <p>3 lower it.</p> <p>4 Now, there is negotiation that goes on. I</p> <p>5 have an ad company do that. They'll negotiate with them</p> <p>6 and say, "Hey, we can't buy the ad at that price." It's</p> <p>7 kind of indirect. We're not going to buy an ad just to</p> <p>8 advertise to brand. We don't brand MyPillow. I've</p> <p>9 never branded in my life. I can't afford to brand.</p> <p>10 Q. Okay. So Fox News is a TV spot?</p> <p>11 A. Yeah. There's a lot of share -- revenue</p> <p>12 shares. It's called direct in the TV part, too, and</p> <p>13 that's more of a guaranteed sale.</p> <p>14 Q. So putting aside the revenue shares, and I -- I</p> <p>15 want to ask about paid TV spots. Is Fox News a paid TV</p> <p>16 spot?</p> <p>17 A. Fox News is, yes.</p> <p>18 Q. Is NewsMax?</p> <p>19 A. Yes.</p> <p>20 Q. Is CNN?</p> <p>21 A. Yes.</p> <p>22 Q. Is MSNBC?</p> <p>23 A. Yes.</p> <p>24 Q. Is NBC?</p> <p>25 A. Some of them aren't. Some of them -- some of</p>	<p style="text-align: right;">Page 92</p> <p>1 know, I don't know. It's usually -- I'd have to see</p> <p>2 the -- I'd have to check the number.</p> <p>3 Q. In 2023, would MyPillow have spent on</p> <p>4 advertising over a hundred million dollars, sir?</p> <p>5 A. I have no idea.</p> <p>6 Q. You do not know what the cost of advertising</p> <p>7 was for your company in 2023?</p> <p>8 A. You don't -- you can't -- you don't buy it like</p> <p>9 that. You don't have it in fourth quarter, we're going</p> <p>10 to spend this much on advertising.</p> <p>11 It all changes depending on the footprint</p> <p>12 that's out there. So if you have -- if the -- for</p> <p>13 example, right when -- when the -- when our biggest</p> <p>14 object came in history, it was the spring of 2020, right</p> <p>15 before the China virus. When that happened, when</p> <p>16 everybody was put into quarantine, two things happened</p> <p>17 there. Radio went way down. Radio collapsed because</p> <p>18 people were not in their cars any more. We cancelled a</p> <p>19 lot -- or we got a furlough, basically. I called up the</p> <p>20 T- -- the radio stations and said, "Hey, I don't want to</p> <p>21 buy your ads right now. I want to take a break. Let</p> <p>22 other people that don't know what's going to happen to</p> <p>23 buy your ads."</p> <p>24 And even on the rev shares, I said, "You</p> <p>25 guys should not run this stuff. No one is going to be</p>

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<p style="text-align: right;">Page 93</p> <p>1 listening to the radio."</p> <p>2 TV, what happened there, it did a flip. In</p> <p>3 the history of TV -- it was MyPillow's perfect storm.</p> <p>4 All TV prices came down because people were afraid to</p> <p>5 advertise on TV. MyPillow was on CNN, MSNBC, Fox, all</p> <p>6 over the place, and -- and people were buying direct</p> <p>7 sales. So that was when we -- we went up fourfold as a</p> <p>8 company when that happened, three -- three to fourfold.</p> <p>9 It was our biggest increase ever, and that was in May</p> <p>10 of -- or April of 2020, right when that happened.</p> <p>11 So we made perfect moves then to drop our</p> <p>12 radio and add to TV. And when you add to TV, you just</p> <p>13 didn't advertise to get the brand out there. For</p> <p>14 example, you could buy -- I could buy in CNN in prime</p> <p>15 time on Anderson Cooper -- that's when my book came out,</p> <p>16 too. I could buy an ad there where maybe you paid 10</p> <p>17 grand for a one-minute spot before the virus, and now it</p> <p>18 had dropped down to like \$4,000.</p> <p>19 Well, if you broke even -- your break even</p> <p>20 would be about 5,500 because of product cost. So you</p> <p>21 would buy -- and we just bought whatever we could</p> <p>22 because every one of them was a moneymaker then.</p> <p>23 But now as -- and before that, CNN had</p> <p>24 charged -- was charging too much for their ads, and it</p> <p>25 got to be hard with the election of '16 and stuff. And</p>	<p style="text-align: right;">Page 95</p> <p>1 I -- when I came on -- advert -- infomercials and</p> <p>2 commercials do not work on the front end. They're too</p> <p>3 big. You're advertising to brand to go into the box</p> <p>4 stores.</p> <p>5 Back when I came one in 2011 and did my</p> <p>6 first infomercial, we based it on, hey, I'm going to</p> <p>7 make it on the front end. And so you have to have a</p> <p>8 product that has a wide filter. Everybody uses a</p> <p>9 pillow. And you have to get the ads at the right price.</p> <p>10 So, you know, if you don't -- there's been</p> <p>11 times where we had very little presence on TV. And like</p> <p>12 in '23, you know, there was probably less advertising</p> <p>13 because it was more expensive, more expensive at the</p> <p>14 time. It just depends.</p> <p>15 So when you asked me that --</p> <p>16 Q. So let me see if I can ask a --</p> <p>17 A. It changes every week is what I'm saying, every</p> <p>18 single week.</p> <p>19 Q. -- follow-up question on 2023.</p> <p>20 You would know, though, at the end of any</p> <p>21 year, like 2023, at some point, the company would have</p> <p>22 financial records that identified a number for</p> <p>23 advertising costs, correct?</p> <p>24 A. Yeah. Yeah. Yeah.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 94</p> <p>1 especially MSNBC and Rachel Maddow, her ads were</p> <p>2 30-something thousand dollars for a one-minute spot.</p> <p>3 Now, branders would buy that for impressions. Their --</p> <p>4 you would be insane to buy that. The ads too -- cost</p> <p>5 too much. So that's where MyPillow, it changes with</p> <p>6 the -- with the -- whatever the footprint is out there.</p> <p>7 For example, there would be a week where we</p> <p>8 would spend one -- during that week, we could spend</p> <p>9 probably 2 million a week in 2020, easy, and then you</p> <p>10 would take back 2 to \$5 million -- or 4 to \$5 million</p> <p>11 because you're doing more than a double. It was a</p> <p>12 perfect time in history when that happened.</p> <p>13 So when you ask me about '23, it -- a lot</p> <p>14 of things come into play. How much are on the ads on,</p> <p>15 for instance, FOX or on NewsMax or MSN, whatever it is,</p> <p>16 ABC. If their ads are too high, you also have to have</p> <p>17 the creative work.</p> <p>18 So in -- right now, I only have one thing</p> <p>19 that works right now, and that's multi-products, having</p> <p>20 four different products on the same ad. If -- you might</p> <p>21 have seen the \$25 extravaganza. So that has to make its</p> <p>22 number.</p> <p>23 And as it fatigues -- there's a fatigue</p> <p>24 factor. As it fatigues -- you've got to realize,</p> <p>25 there's no one in the world that's used this model.</p>	<p style="text-align: right;">Page 96</p> <p>1 A. Right.</p> <p>2 Q. And that would be the same for every year for</p> <p>3 MyPillow as a business, correct?</p> <p>4 A. Yeah. And it's different every year, depending</p> <p>5 on what happened that year, the footprint of that year.</p> <p>6 Q. And based on your knowledge of the company, has</p> <p>7 there ever been a year where MyPillow, in terms of</p> <p>8 advertising costs, those costs have exceeded a hundred</p> <p>9 million dollars, sir?</p> <p>10 A. I don't know. It could have maybe in 2020,</p> <p>11 because that was -- with the China virus, it was like,</p> <p>12 oh, we could have bought at least probably a hundred</p> <p>13 million then. That would be the only year, I would</p> <p>14 think.</p> <p>15 Q. Now, is it fair to say that you know how to</p> <p>16 sell the products of MyPillow?</p> <p>17 A. Okay. Yeah.</p> <p>18 Q. You know how to sell them very well, correct,</p> <p>19 sir?</p> <p>20 A. I guess, yeah. I invented it, so I ...</p> <p>21 Q. Okay. You're a good -- do you consider</p> <p>22 yourself to be a good businessman?</p> <p>23 A. A what?</p> <p>24 Q. A good businessman?</p> <p>25 A. Right. Yes.</p>

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<p style="text-align: right;">Page 97</p> <p>1 Q. Okay. And do you consider yourself to be very</p> <p>2 attuned to what works and what doesn't work in terms of</p> <p>3 advertising?</p> <p>4 A. Yes.</p> <p>5 Q. And do you pay attention to what works in terms</p> <p>6 of advertising for selling the MyPillow products on a</p> <p>7 day-to-day basis?</p> <p>8 A. That what?</p> <p>9 Q. Do you pay attention to what works in terms of</p> <p>10 advertising for selling the MyPillow products on a</p> <p>11 day-to-day basis?</p> <p>12 A. I try to -- in my chart, I look at every single</p> <p>13 data to every promo code that's out there and say --</p> <p>14 let's say that Fox News -- like last night, Fox News ran</p> <p>15 a spot, it cost \$13,000, and you can buy two during that</p> <p>16 hour. This is a perfect example. You buy two during</p> <p>17 that hour. Well, the numbers were coming in and it</p> <p>18 didn't match up to what it would -- we should have had</p> <p>19 at that moment and time.</p> <p>20 So I had -- that was one of my things this</p> <p>21 morning, I had to check to make sure two ran, and I was</p> <p>22 right, only one ran.</p> <p>23 It's just deviations in numbers. I -- you</p> <p>24 know. So if you see a number, if you see a success out</p> <p>25 there, you want to duplicate that. If you see a</p>	<p style="text-align: right;">Page 99</p> <p>1 day-to-day basis?</p> <p>2 A. You have to. You have to because if it</p> <p>3 fatigues below that break even, you have to either get</p> <p>4 the ad cheaper, change the offer or change the product</p> <p>5 or drop it altogether. There's no other way. What if</p> <p>6 you only had to live on that spot and that moment in</p> <p>7 time?</p> <p>8 MS. WRIGLEY: Let's go off the record and</p> <p>9 take a break.</p> <p>10 THE VIDEOGRAPHER: Okay. We're going off</p> <p>11 the record at 10:33.</p> <p>12 (Short recess.)</p> <p>13 THE VIDEOGRAPHER: And we're back on record</p> <p>14 at 11:08.</p> <p>15 Q. (BY MS. WRIGLEY) Mr. Lindell, you published a</p> <p>16 number of documentaries about election fraud in 2021 and</p> <p>17 2022, correct?</p> <p>18 A. Yes.</p> <p>19 Q. The series is called the "Absolute Proof"</p> <p>20 series, correct?</p> <p>21 A. Well, one's called "Absolute Proof"; one's</p> <p>22 called "Scientific Proof"; one's called "Absolute</p> <p>23 Interference."</p> <p>24 Q. And in those, the documentaries you just</p> <p>25 mentioned, in a number of places you had indicated or</p>
<p style="text-align: right;">Page 98</p> <p>1 failure, you fix it and you fix what happened. And this</p> <p>2 could be a preemption. Something could have happened.</p> <p>3 A host -- you know, let's say it's a -- I don't know.</p> <p>4 So and so does a read. Let's say it's a</p> <p>5 guy named -- this just happened the other day. It was</p> <p>6 Tim Pool, and his -- this number went way up. Well,</p> <p>7 that had to happen for a reason, and it's -- it was a --</p> <p>8 it was me that had did the read that day. If somebody</p> <p>9 else would have looked at it instead of him doing the</p> <p>10 read or -- it's just a deviation.</p> <p>11 So let's say it's -- let's say Hannity did</p> <p>12 really good on his read that he does. If he did really</p> <p>13 good, we would pull it because we know what the numbers</p> <p>14 should be, just like in an election. Something's wrong.</p> <p>15 So you look it up, and it can be good or bad. That's a</p> <p>16 good day. You get the read and find out what he said.</p> <p>17 Maybe he said something like, hey, my mom</p> <p>18 got the pillow and it helped her, whatever. And</p> <p>19 whatever that is that he said, then you would let</p> <p>20 other -- you might let other podcasters know and you</p> <p>21 want to duplicate it. If you -- we tried different</p> <p>22 products, different offers, if one does good, then we</p> <p>23 duplicate it.</p> <p>24 Q. So, sir, you pay very close attention to how</p> <p>25 well advertising for MyPillow products are doing on a</p>	<p style="text-align: right;">Page 100</p> <p>1 your guess indicated that there was a hundred percent</p> <p>2 proof that voting machines had been involved in</p> <p>3 interfering with the 2020 presidential election,</p> <p>4 correct?</p> <p>5 A. I probably said that. I -- the evidence I got</p> <p>6 on January 9th, yes.</p> <p>7 Q. And in those documentaries, you stated that you</p> <p>8 had a hundred percent proof that Smartmatic machines</p> <p>9 were involved in interfering with the 2020 presidential</p> <p>10 election?</p> <p>11 A. I believe -- I'd have to rewatch all the</p> <p>12 videos. I believe that got brought up in "Scientific</p> <p>13 Proof" when Dr. Doug Frank came in and he said all</p> <p>14 machines. He says, yes, Smartmatic, Dominion, it</p> <p>15 doesn't matter. I think that's the first time that</p> <p>16 might have been mentioned, but I don't know. I'd have</p> <p>17 to rewatch them.</p> <p>18 Q. Okay. Now, the first documentary on election</p> <p>19 fraud was "Absolute Proof" --</p> <p>20 A. Uh-huh --</p> <p>21 Q. -- that was put out on February 5th, 2021?</p> <p>22 A. That's correct. 9:00 a.m.</p> <p>23 Q. And did you intend for Smartmatic to be named</p> <p>24 or identified as part of the election fraud in "Absolute</p> <p>25 Proof"?</p>

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<p style="text-align: right;">Page 101</p> <p>1 A. When -- in "Absolute Proof," what led up to</p> <p>2 that was two generals and a colonel told me that they</p> <p>3 validated all my evidence and said, yes, it's all true.</p> <p>4 General McInerney, General -- or Colonel Phil Waldron.</p> <p>5 And I had never met these guys before. And then later</p> <p>6 on, I guess, General Flynn.</p> <p>7 So when we did that, this was all about</p> <p>8 Dennis Montgomery's Hammer Scorecard and working with</p> <p>9 the CIA.</p> <p>10 And I'd have to have backtrack, but I had</p> <p>11 met with -- the first time I heard about it was</p> <p>12 January 9th from Mary Fanning, and I had never met her</p> <p>13 before, and it was like, pff, it was like it answered</p> <p>14 all my questions I had of why people voted that didn't</p> <p>15 live in those states or didn't live in the counties and</p> <p>16 they voted anyway across our whole country.</p> <p>17 Q. And, sir, did you intend in connection with</p> <p>18 "Absolute Proof" from February 5th, 2021 for Smartmatic</p> <p>19 to be identified --</p> <p>20 A. I don't even know if they were identified after</p> <p>21 we watched the movies. It was all computers, all</p> <p>22 machines, all voting machine companies, all these</p> <p>23 companies, and I didn't -- I don't know if we focused on</p> <p>24 any names. I would say we've got to get rid of these</p> <p>25 electronic voting machines.</p>	<p style="text-align: right;">Page 103</p> <p>1 A. Yes.</p> <p>2 Q. And is that yourself, sir?</p> <p>3 A. Yes.</p> <p>4 Q. Who are you here -- who are you in this image</p> <p>5 with?</p> <p>6 A. That is Scott -- Colonel Phil Waldron, who</p> <p>7 worked for the government with cyber.</p> <p>8 Q. And Colonel Waldron appeared and talked about</p> <p>9 election fraud for the 2020 election in "Absolute</p> <p>10 Proof," correct?</p> <p>11 A. He appeared to talk about -- yeah. When you</p> <p>12 say "election fraud," about the machine companies or the</p> <p>13 machines. The -- he was -- I believe he worked for the</p> <p>14 government. He was a cyber expert. I had not met him</p> <p>15 before.</p> <p>16 Q. You had not met him before he came on "Absolute</p> <p>17 Proof"?</p> <p>18 A. None of these guys I had ever met before. And</p> <p>19 this was all done live. I didn't -- and we</p> <p>20 didn't practice. It was like, pow. This was -- this</p> <p>21 was as live as it got.</p> <p>22 Q. Okay. Now, if you go to the next page,</p> <p>23 screenshot B, do you recognize this to be an image from</p> <p>24 "Absolute Proof"?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 102</p> <p>1 Q. Let me show you an exhibit. This one has been</p> <p>2 marked Exhibit 595.</p> <p>3 (Exhibit 595 marked.)</p> <p>4 Q. (BY MS. WRIGLEY) It was previously included as</p> <p>5 an exhibit to the complaint. That's why it says</p> <p>6 "Exhibit 2."</p> <p>7 And I'll represent for the record that this</p> <p>8 is a series of screenshots --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- from "Absolute Proof" --</p> <p>11 A. Right.</p> <p>12 Q. -- that were taken and included as exhibits to</p> <p>13 the complaint.</p> <p>14 A. Yep.</p> <p>15 Q. The screenshots are labeled with sort of</p> <p>16 letters, and at the bottom, they're identified with the</p> <p>17 time during which this particular screenshot appears.</p> <p>18 A. Yep.</p> <p>19 Q. And I'll walk through these with you.</p> <p>20 A. Okay.</p> <p>21 Q. If you can turn to the second page. Do you see</p> <p>22 screenshot A, sir?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Do you recognize that as being an image from</p> <p>25 the "Absolute Proof" documentary?</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. And who is the gentleman sitting across --</p> <p>2 A. Shiva. I don't know his full name. Dr. Shiva.</p> <p>3 I believe he's from Massachusetts. He's a -- I can't</p> <p>4 even remember his credentials, but it's -- he's a</p> <p>5 massive 190 IQ, and he had -- he brought up the machines</p> <p>6 as something that they had problems with in his</p> <p>7 election, I believe. I'm trying to think back, but</p> <p>8 yeah.</p> <p>9 Q. Now, if you could turn the page to screenshot</p> <p>10 C, do you recognize this image from "Absolute Proof"?</p> <p>11 A. Dr. Colbeck.</p> <p>12 Q. And you're sitting there with Mr. Colbeck?</p> <p>13 A. Uh-huh.</p> <p>14 Q. And who's Mr. Colbeck?</p> <p>15 A. He's a rocket scientist. He was -- he worked</p> <p>16 for -- a literal rocket scientist, and he -- from</p> <p>17 Michigan. He actually works for me now.</p> <p>18 Q. Had you met him before he appeared on "Absolute</p> <p>19 Proof"?</p> <p>20 A. No. None of these guys. Never met them before</p> <p>21 in my life.</p> <p>22 Q. And then you had not met Colonel Waldron before</p> <p>23 he appeared in "Absolute Proof"?</p> <p>24 A. No.</p> <p>25 Q. If you look at screenshot D on the next page,</p>

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<p style="text-align: right;">Page 105</p> <p>1 do you recognize that image from "Absolute Proof"?</p> <p>2 A. That is -- what's his name -- Matt DePerno.</p> <p>3 Q. And who is Mr. DePerno?</p> <p>4 A. At that time, he was a little lawyer from</p> <p>5 Michigan, and he was -- it was all over the news about</p> <p>6 Antrim County, Michigan, and he was the lawyer involved</p> <p>7 there that -- that then they flipped the election there</p> <p>8 in Antrim County. They did a big investigation, and FBI</p> <p>9 came in. They didn't press charges against -- they</p> <p>10 deleted all the files. But this is all the stuff he</p> <p>11 brought I heard for the first time. But he was a</p> <p>12 lawyer, just a hometown lawyer at the time, I guess.</p> <p>13 Q. Now, if you flip the page, do you recognize</p> <p>14 this image from "Absolute Proof"?</p> <p>15 A. Yes.</p> <p>16 Q. And this indicates, "On the phone with Mary</p> <p>17 Fanning, national intelligent researcher and author."</p> <p>18 Do you see that?</p> <p>19 A. Correct.</p> <p>20 Q. And who is Mary Fanning, sir?</p> <p>21 A. She -- I got a call on January 9th, 2021. I</p> <p>22 was very frustrated after two months of looking at every</p> <p>23 county and state in this country and finding thousands</p> <p>24 of voters that voted -- like in my home state of</p> <p>25 Minnesota, that voted in a state they didn't live there,</p>	<p style="text-align: right;">Page 107</p> <p>1 government, the CIA, talked about all the -- how the</p> <p>2 machines -- the electronic voting machines. I go, wow.</p> <p>3 That explains everything to me to -- explains all the</p> <p>4 deviations I've seen across our country.</p> <p>5 So Mary Fanning -- and she was -- I've</p> <p>6 never met her. She's pretty secretive about her --</p> <p>7 well, I guess, about coming out in public. I've never</p> <p>8 met her. And that was the only date.</p> <p>9 And then from there on, she -- somehow I</p> <p>10 got introduced then to Dennis Montgomery by phone, and</p> <p>11 then I went through this validating his stuff and -- but</p> <p>12 everything she told me that day was validated. He</p> <p>13 really did work for the CIA. So everything made sense.</p> <p>14 Things I could validate that day, it explained it. It</p> <p>15 was a perfect fit.</p> <p>16 And then Mary -- oh, the next time I was</p> <p>17 with Mary -- or not with her, but when she did -- when</p> <p>18 we did "Absolute Proof," I don't know for sure, but I</p> <p>19 think she was the one that gathered up all these people</p> <p>20 that came there. I don't know -- I'm pretty sure it was</p> <p>21 her.</p> <p>22 Q. So let me ask some follow-up questions on that.</p> <p>23 You had a call with Brannon Howse and Mary Fanning on</p> <p>24 January 9, 2021, correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 106</p> <p>1 or Nevada or Wisconsin. You name a state. And I bought</p> <p>2 all the voter rolls. I got the voter rolls.</p> <p>3 So this came right from the Secretary of</p> <p>4 State. So I'm going people are generally good people.</p> <p>5 I just couldn't see people going, hey, 5,000, let's jump</p> <p>6 into Wisconsin and vote for Biden. I mean, people are</p> <p>7 gen -- aren't going to do that. It didn't make sense.</p> <p>8 I looked at numbers for two months, my own</p> <p>9 numbers, and when Mary called with a guy named Brannon</p> <p>10 Howse -- and Brannon Howse, the only reason I answered</p> <p>11 the phone that day, he spell -- I spelled his name</p> <p>12 H-O-U-S-E, and his real last name is H-O-W-S-E. So I</p> <p>13 thought it was somebody about my house. I didn't -- you</p> <p>14 know, it was put in my phone, and I guess I had been on</p> <p>15 his podcast at some time one time, so he had my phone</p> <p>16 number.</p> <p>17 And he had -- and Mary Fanning had talked</p> <p>18 him into calling me, and he says, "You don't know me,</p> <p>19 but you were on my podcast once. You really need to</p> <p>20 listen to this lady, if you could."</p> <p>21 And I said, "Sure."</p> <p>22 She talked for 15 minutes straight without</p> <p>23 me saying a word, and my mouth dropped.</p> <p>24 I said -- and she said she -- she told me</p> <p>25 all about this Dennis Montgomery, worked for the</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. And that was -- during that call, if I</p> <p>2 understand your testimony, they provided you with proof</p> <p>3 about election fraud from the 2020 election?</p> <p>4 A. That -- this was already up on the Internet.</p> <p>5 They told me to look. It was something -- I think she</p> <p>6 has her own website or podcast or something, and you see</p> <p>7 these little things going back and forth, and that was</p> <p>8 already up on, I believe, Twitter. It was all over the</p> <p>9 media. And they hadn't covered it up yet, I don't</p> <p>10 think.</p> <p>11 Q. So she point -- Mary Fanning pointed you to</p> <p>12 something that she had published online?</p> <p>13 A. I think so.</p> <p>14 Q. Okay.</p> <p>15 A. I mean, it was at -- but it was more listening</p> <p>16 to what she had to say, and I'm writing stuff down. I'm</p> <p>17 going nobody can make this up. This is bizarre.</p> <p>18 But it was the perfect fit for what I had</p> <p>19 spent two months trying to explain how, you know, for</p> <p>20 example, Nevada has 8,000 people voted in Nevada that</p> <p>21 didn't live there. It didn't make sense. And now it</p> <p>22 made sense that just their names were used by computers,</p> <p>23 and that was the -- and she had the answer. The -- she</p> <p>24 had the answer. It all made sense.</p> <p>25 And she said this guy Dennis Montgomery --</p>

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<p style="text-align: right;">Page 109</p> <p>1 she went deep into Dennis Montgomery. She had dates 2 when he worked for the CIA, all these things, and this 3 thing called Hammer Scorecard. 4 And then when Mary put these guys together, 5 then I -- that -- I -- from that point on, it was 6 validating, validating with -- you know, after I talked 7 to Dennis and stuff and so... 8 Q. So I just want to -- let me ask you a 9 follow-up. Mary Fanning gave you information about the 10 2020 election that she had obtained from Dennis 11 Montgomery? 12 A. I didn't know where she had obtained it at that 13 time. She said Dennis Montgomery, and she went deep 14 into the Dennis Montgomery and Hammer -- this thing 15 called Hammer Scorecard. 16 Q. And during that call on January 9th, she went 17 deep into the proof or the evidence she had being 18 related to Hammer and Scorecard? 19 A. She mentioned Hammer Scorecard. I didn't know 20 what it was. 21 Q. Now, had you met Brannon Howse before -- 22 A. No. 23 Q. -- that call on the 9th? 24 A. No. 25 Q. Had you met Mary Fanning before the call on</p>	<p style="text-align: right;">Page 111</p> <p>1 true, every -- it explains everything that -- I had 2 spent days and hours, every day going people are good 3 people, they would not go into another county and commit 4 a crime and -- 5 Q. So let me go back to my question. Did you have 6 an understanding on January 9th whether Mary Fanning had 7 any background with regard to elections? 8 A. She -- I didn't know who Mary Fanning was, so 9 I -- but then she was telling me this, so I had to go 10 verify what she was telling me. 11 Q. Did you have any understanding of whether Mary 12 Fanning had any background in technology or 13 cybersecurity? 14 A. It sure sounded like she did. 15 Q. Okay. 16 A. I -- very much so. 17 Q. Ms. Fanning identified for you, in connection 18 with this -- this proof, a gentleman named Dennis 19 Montgomery? 20 A. Yeah. And I don't even know if she said Dennis 21 Montgomery on the phone. I can't remember that. She 22 might have said "person." I don't know. 23 But shortly after that, I was introduced by 24 phone to Dennis, and I went out and validated all those 25 dates that Mary had told me, and we actually had her --</p>
<p style="text-align: right;">Page 110</p> <p>1 January 9th? 2 A. No. 3 Q. Did you have any information about Mary 4 Fanning's background during that call on January 9th? 5 A. Yes. Brannon Howse, I had been on his podcast 6 or his show on WVW. So I was on there. And I think 7 Mary might have been a guest on there. That part, I 8 don't know. I -- you know, because I was on so many 9 stations in those two months, and I didn't remember at 10 the time. 11 But Brannon Howse, he -- he brought me 12 back, said here -- and he explained who Mary was to me 13 on the phone. She's a journalist, she's a, whatever, 14 investigator, blah, blah, blah. 15 Q. Now, did you have an understanding on 16 January 9th whether Mary Fanning had any background in 17 elections? 18 A. Yeah, I didn't care about the elections. I 19 wanted to know what she had. She had these things, 20 these pictures and these things that -- I think it was 21 six pages of -- of flips and stuff, and -- and I said -- 22 that's when I said, "Well, I want to do more." 23 I was -- I always want to do more due 24 diligence, and that's when I said, "Well, can I meet" -- 25 I got done and my mouth was open, and, wow, if this is</p>	<p style="text-align: right;">Page 112</p> <p>1 I made another recording of hers. We made her do a -- 2 "Can you say the same thing you said to me?" She did a 3 15-minute recording, which I have, which -- very 4 detailed of dates of Dennis Montgomery's time in 5 courtrooms and everything else. So those -- that's what 6 I went and validated. 7 Q. So then subsequent to the January 9th, 2021 8 call, you had a conversation with Dennis Montgomery? 9 A. After that? 10 Q. Yes. 11 A. Yeah, sometime after that. 12 Q. Was that call with Mr. Montgomery before 13 "Absolute Proof" on February 5th, 2021? 14 A. Before "Absolute Proof." 15 Q. Okay. Now, I think you mentioned you did some 16 validation work with respect to Dennis Montgomery, 17 correct? 18 A. A ton, yeah. 19 Q. What validation work did you do during that 20 period of time between January 9, 2021 and February 5th, 21 2021 of Dennis Montgomery's work, sir? 22 A. Yeah. We had -- checking out her stories that 23 he worked for the CIA and all these things, and -- and 24 checking out Hammer -- you know, Hammer Scorecard. 25 There was things you could find on the Internet. It was</p>

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<p style="text-align: right;">Page 113</p> <p>1 mentioned actually quite a bit on Twitter and the 2 Internet. 3 I believe at that time, even Sidney Powell 4 had put out stuff related to a -- I don't know if she 5 called it a Kraken. I can't remember when it was on the 6 Internet. But you could find stuff all over the place 7 on that. 8 But specifically for me, as I -- Dennis, on 9 the phone, we -- my fiance, or my wife now, at the time, 10 we -- we talked to him on the phone for probably two 11 hours, and I'm asking him questions and going back. 12 And then he said -- you could find stuff 13 where he was in court with the -- his testimony with the 14 FBI and up in -- and the CIA. 15 Then we also had a tape where Sean Hannity 16 and Sara Carter and -- I'm trying to -- Sara Carter and 17 I think it was Solomon. I can't remember his first 18 name. This was on FOX, and I believe it was in 2017. 19 You can find the tape. And had filmed that, and watched 20 that, and it was, wow. 21 They had done an investigation, Dennis 22 Montgomery. And Sean Hannity says, "This is the 23 most" -- "biggest discovery," he called it, it could be 24 in history. And -- and they were going to have him back 25 on. Now, whether they ever did, I think that got shot</p>	<p style="text-align: right;">Page 115</p> <p>1 Q. Yeah, just focus on that period of time, sir. 2 A. Till January 5th? 3 Q. Yes. 4 A. Talked to, I think, cyber guys at the time; one 5 being Todd Sanders, Conan Hayes. I know they had -- 6 because they had already looked into his stuff, I found 7 out, and that was through Patrick Byrnes [sic], I 8 believe. I believe Patrick Byrnes, they had already 9 found out -- I found out about these two guys. 10 So between the 9th and the movie, those two 11 cyber guys had worked at -- I believe they worked for 12 Patrick Byrnes. I don't know that for a fact, but they 13 came and said -- and they validated, validated, 14 validated, and he said, yes, it's all -- 15 MR. KACHOUROFF: Mike, if you don't recall 16 between a -- what she's talking about that time period, 17 don't guess. 18 THE WITNESS: Yeah. 19 MR. KACHOUROFF: Just -- you need to tell 20 her, "I don't remember." 21 A. Yeah, I don't know the exact, so I don't know 22 if that was between there or not. I believe it was. 23 But my biggest validation came the week 24 of when we were bringing these people in and talking. 25 General McInerney, I don't know if I had talked to him,</p>
<p style="text-align: right;">Page 114</p> <p>1 down because FOX got -- you know, I don't know why it 2 got shot down. 3 But that video in 2017, it just validated 4 everything about Dennis Montgomery. Sara Carter's on 5 there going, "Here's what we found. We did our 6 investigation, we interviewed him, we looked at all his 7 stuff for Hammer Scorecard." 8 Q. So let me -- 9 A. And Sean said that they -- they said if you 10 stacked the papers -- this was on that show on FOX -- if 11 you stacked his -- because Hammer Scorecard pulls 12 information, and one can pull information, break into 13 anything -- break into any computer, pull it, and then 14 do whatever it wants. 15 And they said -- Sean Hannity's quote on 16 there -- or Sara Carter's was, "There's enough stuff 17 here to go" -- "if you stack papers, it would go halfway 18 to the sun." It was a crazy quote that they said. 19 Q. So, Mr. Lindell, let me follow up and break 20 that down a little bit. 21 In doing this validation work between 22 January 9th and February 5th on Dennis Montgomery, you 23 checked his story out on the Internet; is that correct? 24 A. That and other -- and I had other people to -- 25 I don't know what time I had -- I had --</p>	<p style="text-align: right;">Page 116</p> <p>1 but this guy worked with -- many of these people worked 2 directly with Dennis Montgomery. One of them's name was 3 Bill Binney. 4 There was a gal that brought stuff to me -- 5 Q. (BY MS. WRIGLEY) So, Mr. Lindell, let me 6 just -- I want to move this -- 7 (Crosstalk.) 8 A. Well, this was another gal. 9 Q. (BY MS. WRIGLEY) I -- 10 A. This was definitely during that time period. 11 Her name was Tomi Collins. She -- her -- Tomi Collins. 12 She brought evidence to me that was a -- it was Dennis's 13 evidence. Same evidence. And she said that Bill Binney 14 had worked on it. And I said, well, yeah, he -- well, 15 he validated that he had worked on it with Dennis 16 Montgomery. Bill Binney worked for the government, too. 17 Q. Mr. Lindell, I'd just ask that you slow down a 18 little bit for the court reporter. 19 A. Yes. Okay. 20 Q. So let me just focus on the time period -- 21 A. This was definitely between -- Bill Binney 22 was -- he worked in the government. He was a cyber guy. 23 He worked with the government directly with Dennis 24 Montgomery. That was part of my validation with Tomi 25 Collins.</p>

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<p style="text-align: right;">Page 117</p> <p>1 Q. During that --</p> <p>2 A. That was on January 15th, by the way.</p> <p>3 Q. During that time period from the 9th to the</p> <p>4 5th -- just focus on my questions --</p> <p>5 A. Yeah.</p> <p>6 Q. -- you looked up information about Dennis</p> <p>7 Montgomery online; is that correct?</p> <p>8 A. No. I did more than that.</p> <p>9 Q. Did you -- well, I'm just -- you did that. It</p> <p>10 includes that, right?</p> <p>11 A. Yeah, I looked onto Twitter just to see those</p> <p>12 pages of Mary Fanning.</p> <p>13 Q. Okay. And then you also watched a program from</p> <p>14 Hannity that was on FOX from 2017 --</p> <p>15 A. Right. And I reached out to --</p> <p>16 Q. -- is that correct?</p> <p>17 A. Yeah. Yes.</p> <p>18 Q. Okay. And --</p> <p>19 A. And I talked to Tomi Collins --</p> <p>20 Q. Okay.</p> <p>21 A. -- who was with Bill Binney, who worked</p> <p>22 directly with Dennis Montgomery. That was on January</p> <p>23 14th.</p> <p>24 Q. Okay. So on the --</p> <p>25 A. So that's --</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. Who?</p> <p>2 A. A pastor friend.</p> <p>3 Q. What is his name, sir?</p> <p>4 A. Romero Pena.</p> <p>5 Q. Okay.</p> <p>6 A. He's a Hispanic pastor, and he -- he introduced</p> <p>7 us, I guess.</p> <p>8 Q. And did you understand that in connection with</p> <p>9 the evidence about the 2020 election from January 9th to</p> <p>10 February 5th, the information from Dennis Montgomery,</p> <p>11 that related to Hammer and Scorecard?</p> <p>12 A. That what?</p> <p>13 Q. Related to Hammer and Scorecard?</p> <p>14 A. That what related? I'm not -- I'm</p> <p>15 not under- --</p> <p>16 Q. The information you got from the call on</p> <p>17 January 9th from Brannon Howse and Mary Fanning.</p> <p>18 A. No. She planted the seeds and said -- what she</p> <p>19 did on January 9th, all it did was confirm to me that</p> <p>20 people are generally good people. Hun -- millions of</p> <p>21 people did mar -- not march into other states. I</p> <p>22 already have that evidence. I went and got voter rolls.</p> <p>23 I went and got stuff from the states.</p> <p>24 You had all these people that don't live</p> <p>25 there -- and pick the state of Texas. All these people</p>
<p style="text-align: right;">Page 118</p> <p>1 Q. -- 14th, you talked with Tomi Collins and Bill</p> <p>2 Binney?</p> <p>3 A. I didn't talk personally to Bill Binney. She</p> <p>4 had all the same stuff. She brought it, and I go, "Wow,</p> <p>5 that's the same stuff."</p> <p>6 And then -- and she said, "Yes, this guy</p> <p>7 worked" --</p> <p>8 Q. And who is Bill Binney?</p> <p>9 A. He -- he's a cyber guy that worked with the</p> <p>10 government directly with -- on Hammer Scorecard.</p> <p>11 Q. And who connected you with Bill Binney? Sorry.</p> <p>12 A. Tomi Collins.</p> <p>13 Q. Okay. And who is Tomi Collins?</p> <p>14 A. Tomi Collins was a gal that got connected with,</p> <p>15 with a pastor friend of mine. At that time said this</p> <p>16 gal knows -- could -- she knows stuff that happened with</p> <p>17 the machines and the computers.</p> <p>18 So I reached out to her, and I had never</p> <p>19 met her, and she said, "I have this evidence, and it</p> <p>20 was" -- "it's called Hammer Scorecard."</p> <p>21 Wow, let me just say that. And she -- she</p> <p>22 thought everything came from Bill Binney. They just</p> <p>23 happened to both work on it at the same time.</p> <p>24 Q. How did you get connected with Tomi Collins?</p> <p>25 A. By a pastor friend of mine.</p>	<p style="text-align: right;">Page 120</p> <p>1 that don't live in Texas voted, and their names were</p> <p>2 used. And I'm going, this doesn't make sense. People</p> <p>3 are not going to, this many people, throw the election.</p> <p>4 Because I went back to other elections. I spent two</p> <p>5 months digging into actual names, people that were</p> <p>6 deceased.</p> <p>7 For example, in Alabama, 4,620 people voted</p> <p>8 that were over 110 years old. And I brought that to</p> <p>9 their Secretary of State later on and said, "John, look</p> <p>10 at your state here."</p> <p>11 And he goes, "Well, Mike, we live pretty</p> <p>12 good here in Alabama."</p> <p>13 Now, I dig into numbers. I'm a numbers</p> <p>14 guy. I took calculus in 9th grade. If numbers don't</p> <p>15 make sense -- and this didn't make sense because of</p> <p>16 human behavior. You can't have hundreds of thousands,</p> <p>17 millions of people going, "Hey, let's go commit a</p> <p>18 crime."</p> <p>19 It didn't happen in other elections where</p> <p>20 you -- thousands of people march into Wisconsin and vote</p> <p>21 or march into Maine and vote or Hawaii. So it had to be</p> <p>22 computers, but I didn't have the answer till when she</p> <p>23 said it on January 9th. I go, "Wow." It was like --</p> <p>24 for me, it was like a concept. This is amazing. It</p> <p>25 fits like a glove.</p>

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<p style="text-align: right;">Page 121</p> <p>1 So I -- then I reached out to cyber guys.</p> <p>2 THE COURT REPORTER: Please slow down.</p> <p>3 THE WITNESS: Yeah.</p> <p>4 A. I reached out to cyber guys. I get -- first, I</p> <p>5 went online right away.</p> <p>6 MR. KACHOUROFF: Mike, slow down just a</p> <p>7 little. She can't get it --</p> <p>8 A. I reached out to cyber guys, and then</p> <p>9 evidence -- people were bringing me -- like this, Tomi</p> <p>10 Collins, that was an immediate validation. And then</p> <p>11 talking to Dennis and talking to Mary, and then validate</p> <p>12 he did work for the CIA. He sent me stuff, too, that</p> <p>13 said, "Here, here's my" --</p> <p>14 MR. KACHOUROFF: Mike, you've got to slow</p> <p>15 down. She cannot keep up.</p> <p>16 THE WITNESS: Yeah.</p> <p>17 Q. (BY MS. WRIGLEY) Wait. Mr. Lindell, I want to</p> <p>18 focus you back on exhibit -- an exhibit that we marked.</p> <p>19 MS. WRIGLEY: What did I mark this as?</p> <p>20 MR. KACHOUROFF: 595.</p> <p>21 MS. WRIGLEY: 595.</p> <p>22 MR. KACHOUROFF: That's Exhibit 2?</p> <p>23 MS. WRIGLEY: Yes.</p> <p>24 Q. (BY MS. WRIGLEY) But I'm on -- I'm still on</p> <p>25 the page with the -- that mentions on the phone with</p>	<p style="text-align: right;">Page 123</p> <p>1 A. Here you go. It took time.</p> <p>2 Q. And you paid Brannon Howse for his work on</p> <p>3 "Absolute Proof," too, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Now, in connection with "Absolute Proof," Mary</p> <p>6 Fanning appeared in a conversation or a discussion with</p> <p>7 you at the end of "Absolute Proof," correct?</p> <p>8 A. She couldn't have. She wasn't there.</p> <p>9 Q. She -- she came on by phone, right?</p> <p>10 A. I don't know. I'd have to rewatch it.</p> <p>11 Q. Okay.</p> <p>12 A. Yeah, but she was -- she narrated -- I think</p> <p>13 she narrated the -- the --</p> <p>14 Q. Okay. So if you look at screenshot E --</p> <p>15 A. She explained it.</p> <p>16 Q. -- in this exhibit, do you remember this image</p> <p>17 from "Absolute Proof"?</p> <p>18 A. No, but I'm sure it's there.</p> <p>19 Q. Do you remember Mary Fanning being on "Absolute</p> <p>20 Proof" with you, sir?</p> <p>21 A. Uh-huh.</p> <p>22 Q. And if you flip to the next page, do you see</p> <p>23 screenshot F?</p> <p>24 A. Yes.</p> <p>25 Q. And again, this is a portion. Do you remember</p>
<p style="text-align: right;">Page 122</p> <p>1 Mary Fanning.</p> <p>2 A. Uh-huh.</p> <p>3 Q. You ended up having Mary Fanning on "Absolute</p> <p>4 Proof," correct?</p> <p>5 A. I -- I did. That was -- Brannon -- this all</p> <p>6 came together -- let me tell you how the "Absolute</p> <p>7 Proof" came together.</p> <p>8 Q. Well, sir, let me just focus on the question.</p> <p>9 A. She was --</p> <p>10 Q. Ms. Fanning does appear up here on the --</p> <p>11 (Crosstalk.)</p> <p>12 A. She was -- she was hired to -- she was hired by</p> <p>13 me. I actually paid her. I didn't hire to do it. I</p> <p>14 paid her out of the goodness of my heart after she</p> <p>15 produced -- helped produce.</p> <p>16 Q. (BY MS. WRIGLEY) Okay. So let me back up.</p> <p>17 "Absolute Proof" was produced by Brannon</p> <p>18 Howse, Mary Fanning and yourself, correct?</p> <p>19 A. Right.</p> <p>20 Q. And you paid Ms. Fanning for the work she did</p> <p>21 in helping to create "Absolute Proof" after you --</p> <p>22 A. After the fact. There was no contract.</p> <p>23 Q. -- after you --</p> <p>24 A. I did it out of the goodness of my heart.</p> <p>25 Q. And --</p>	<p style="text-align: right;">Page 124</p> <p>1 putting information like this up on "Absolute Proof"?</p> <p>2 A. Yes.</p> <p>3 Q. And is this information that you got from Mary</p> <p>4 Fanning?</p> <p>5 A. This -- they put it all up. This is -- she</p> <p>6 produced it.</p> <p>7 Q. Okay.</p> <p>8 A. So, yeah, this would have been put up on the</p> <p>9 screen.</p> <p>10 Q. And Mary Fanning explained how this was proof</p> <p>11 that votes were changed in the 2020 presidential</p> <p>12 election, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And then if you go to the next screenshot,</p> <p>15 screenshot G, do you recognize that image in "Absolute</p> <p>16 Proof," sir?</p> <p>17 A. Yes.</p> <p>18 Q. And is that you sitting there?</p> <p>19 A. Uh-huh.</p> <p>20 Q. And then there's some images of some arched</p> <p>21 lines going from --</p> <p>22 A. Right.</p> <p>23 Q. -- country to country --</p> <p>24 A. Yep.</p> <p>25 Q. -- on the screen behind you. Do you see that?</p>

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<p style="text-align: right;">Page 125</p> <p>1 A. Right.</p> <p>2 Q. And do you remember discussing those images or</p> <p>3 that video with Ms. Fanning during Absolute Proof?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And was that presented as additional</p> <p>6 evidence that votes were changed in the 2020 election?</p> <p>7 A. I think it was more focused on China about</p> <p>8 hacking into our election. That was my thing. I</p> <p>9 believed, you know, that China, which knowledge had been</p> <p>10 completely validated, that they did hack in. So...</p> <p>11 Q. Okay.</p> <p>12 A. But they -- yeah. This -- I was very focused</p> <p>13 on the China. If you go back there, it was mostly on</p> <p>14 China.</p> <p>15 Q. Okay. Sir, at this point in time, I had</p> <p>16 mentioned before we came back on from the break that I'd</p> <p>17 been playing a video.</p> <p>18 For the record, I'm going to play -- I'm</p> <p>19 not going to play the entire "Absolute Proof." It's</p> <p>20 long, as I'm sure you remember, sir, but just a clip.</p> <p>21 This clip has a conversation that you're</p> <p>22 having with Phil Waldron at the time.</p> <p>23 A. Okay.</p> <p>24 Q. So my colleague is going to come around. We're</p> <p>25 going to stop the record, we'll come back on, she'll</p>	<p style="text-align: right;">Page 127</p> <p>1 this is a coup, that it definitely involved elements</p> <p>2 inside our own country and inside our own federal</p> <p>3 government. Definitely -- definitely part of a coup</p> <p>4 that was aided and abetted by a foreign threat, nation</p> <p>5 state -- appeared in the nation state.</p> <p>6 MR. LINDELL: Right. Do you believe this</p> <p>7 attack from other countries could not have happened</p> <p>8 without people here domestic, people domestic traitors,</p> <p>9 basically?</p> <p>10 COL WALDRON: Yeah, I believe that. Again,</p> <p>11 we have affidavits of CIA and State Department personnel</p> <p>12 out of the Italian embassy participating in this coup.</p> <p>13 We have a name, e-mail and phone number of a senior DOJ</p> <p>14 official from a -- from a U.S. attorney that said that</p> <p>15 this individual was shutting down any DOJ or FBI</p> <p>16 investigation into any election -- any election-related</p> <p>17 investigation, and shutting -- trying to shut down</p> <p>18 judicial cases, court cases. So from inside our own</p> <p>19 DOJ, people were shutting down active investigations.</p> <p>20 You wonder why, you know, Mr. Barr didn't find or see</p> <p>21 any evidence of widespread election fraud is because the</p> <p>22 FBI never did anything, other than impede investigations</p> <p>23 into election fraud. The FBI went to question the truck</p> <p>24 drivers who delivered ballots and created affidavits.</p> <p>25 They were harassing, you know, the Americans, you know,</p>
<p style="text-align: right;">Page 126</p> <p>1 play it, we'll watch a clip of it. Again, it's not</p> <p>2 entirely "Absolute Proof," and then I'll ask you some</p> <p>3 questions about it.</p> <p>4 A. That's fine. That's fine.</p> <p>5 Q. Okay.</p> <p>6 MS. WRIGLEY: Let's go off the record.</p> <p>7 THE VIDEOGRAPHER: And we're going off the</p> <p>8 record at 11:33.</p> <p>9 (Short recess.)</p> <p>10 THE VIDEOGRAPHER: And we're back on record</p> <p>11 at 11:34.</p> <p>12 MS. WRIGLEY: Just for the record, I'm</p> <p>13 going to be playing a clip from "Absolute Proof." This</p> <p>14 appears around minute -- or 19:37, and it plays for a</p> <p>15 couple minutes until minute 22:56.</p> <p>16 This is being marked as Exhibit 596.</p> <p>17 (Exhibit 596 marked.)</p> <p>18 MS. WRIGLEY: Go ahead and play.</p> <p>19 (Clip of "Absolute Proof.")</p> <p>20 COL WALDRON: Say it again.</p> <p>21 MR. LINDELL: This is an attack by other</p> <p>22 countries of foreign -- of foreign countries is what</p> <p>23 you're saying then?</p> <p>24 COL WALDRON: I -- I believe from what I've</p> <p>25 seen and the -- the witnesses that I have talked to that</p>	<p style="text-align: right;">Page 128</p> <p>1 patriotic Americans who were whistle blowers --</p> <p>2 MR. LINDELL: Right.</p> <p>3 COL WALDRON: -- and prosecuting them.</p> <p>4 Mike, you mentioned something earlier is</p> <p>5 the machines, the ES&S and Dominion machines. If you</p> <p>6 look at, you know, military finding factors, there are</p> <p>7 critical capabilities. The capability is what you have</p> <p>8 to have to execute your mission or the enemy has to have</p> <p>9 to execute its mission successfully.</p> <p>10 So critical capability for any of this to</p> <p>11 happen are the inherent vulnerabilities that were built</p> <p>12 into the ES&S and Dominion software, which is -- you</p> <p>13 know, again, we've proven through our work that this is</p> <p>14 all related directly back to the soft -- Smartmatic.</p> <p>15 Smartmatic -- SGO Smartmatic software core.</p> <p>16 MR. LINDELL: Wow.</p> <p>17 COL WALDRON: And they definitely had</p> <p>18 financial gains to -- to -- financial reasons, based on</p> <p>19 some of the other investments that they've made.</p> <p>20 Especially, they -- you know, looking down the road, if</p> <p>21 they make billions and billions of dollars, the board of</p> <p>22 SGO Smartmatic, because they own a -- an air</p> <p>23 purification company. So just think about it. If you</p> <p>24 could get to pick an administration that is favorable to</p> <p>25 your company, say if they pass the Green New Deal and</p>

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<p style="text-align: right;">Page 129</p> <p>1 you're going to make billions and billions of dollars</p> <p>2 off of government-mandated air purification systems in</p> <p>3 public buildings and apartment buildings and industrial</p> <p>4 complexes, you know, you would spend quite a bit of</p> <p>5 money on the front side to make sure the election was --</p> <p>6 (End of video clip.)</p> <p>7 THE WITNESS: There you have it.</p> <p>8 Q. (BY MS. WRIGLEY) Mr. Lindell, do you recognize</p> <p>9 that clip as being part of your "Absolute Proof"</p> <p>10 documentary?</p> <p>11 A. Yes.</p> <p>12 Q. And in that clip that -- Colonel Phil Waldron</p> <p>13 appeared?</p> <p>14 A. Uh-huh.</p> <p>15 Q. I think he was one of the individuals that you</p> <p>16 mentioned earlier --</p> <p>17 A. Uh-huh.</p> <p>18 Q. -- as well?</p> <p>19 And did you hear that he identified SGO or</p> <p>20 Smartmatic software as being part of the coup that he</p> <p>21 was talking about?</p> <p>22 A. Uh-huh.</p> <p>23 Q. And did you know that he would be identifying</p> <p>24 Smartmatic before Absolute Proof was taped?</p> <p>25 A. I didn't even know him. This was the first</p>	<p style="text-align: right;">Page 131</p> <p>1 Q. Okay. You arranged for Absolute Proof to be</p> <p>2 aired on OAN?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. And OAN, that's One America News</p> <p>5 Network, correct?</p> <p>6 A. Uh-huh.</p> <p>7 Q. And you arranged for the "Absolute Proof"</p> <p>8 documentary to be posted to social media platforms as</p> <p>9 well?</p> <p>10 A. We tried everything, and we put -- the first</p> <p>11 thing we put it up on was Vimeo. They took it down in</p> <p>12 three minutes. We put it up on YouTube, and they made</p> <p>13 it 40 minutes to take it down. Then we put it up, I</p> <p>14 think, Rumble. The stream -- they kept destroying the</p> <p>15 streams, whatever, or taking it down because they didn't</p> <p>16 want it out there. It's censored.</p> <p>17 Q. Now, after this was taped, including the</p> <p>18 segment with Mr. Waldron, you knew that the information</p> <p>19 identifying Smartmatic would be published on OAN when</p> <p>20 you arranged for it to be aired, correct?</p> <p>21 A. When it was in there, yes.</p> <p>22 Q. Okay. And that's the same for when it got</p> <p>23 posted to social media?</p> <p>24 A. What's that?</p> <p>25 Q. Is it the same for when it got posted to social</p>
<p style="text-align: right;">Page 130</p> <p>1 time I met him, right there, just like you watched him.</p> <p>2 Q. Okay. Did you object or say anything when made</p> <p>3 SGO or Smartmatic in the --</p> <p>4 A. No. He's a Colonel that works for the</p> <p>5 government. I trusted him.</p> <p>6 Q. Okay. So you didn't do anything to stop or</p> <p>7 correct him from identifying Smartmatic in "Absolute</p> <p>8 Proof"?</p> <p>9 A. As far as what? Because Smartmatic? What are</p> <p>10 you saying? You're saying it's not true? I don't</p> <p>11 understand what you're asking.</p> <p>12 Q. Did you do anything to prevent or stop Colonel</p> <p>13 Phil Waldron from identifying Smartmatic --</p> <p>14 A. I was listening to a government official --</p> <p>15 THE COURT REPORTER: I can only take one at</p> <p>16 a time.</p> <p>17 THE WITNESS: Yeah.</p> <p>18 A. I was listening to a government Colonel telling</p> <p>19 me -- who worked for the government in that space,</p> <p>20 telling me what he believed to be facts.</p> <p>21 Q. (BY MS. WRIGLEY) Did you watch "Absolute</p> <p>22 Proof" after the whole thing was taped?</p> <p>23 A. No. I don't -- I had to do it -- well, I kind</p> <p>24 of did because I had -- I went on OAN, and I had to</p> <p>25 watch it and comment in between the following day.</p>	<p style="text-align: right;">Page 132</p> <p>1 media?</p> <p>2 A. Yeah.</p> <p>3 Q. Okay. You knew that Smartmatic would be</p> <p>4 identified as being part of the coup?</p> <p>5 A. One of the machine companies in the country</p> <p>6 that had been long identified, yes.</p> <p>7 Q. Okay.</p> <p>8 A. Smartmatic, yes, ES&S, Dominion, we all know</p> <p>9 who the machine companies are.</p> <p>10 Q. And at that point in time, did you have any</p> <p>11 evidence that Smartmatic was part of rigging the 2020</p> <p>12 election?</p> <p>13 A. Evidence that they were? I had all kinds of</p> <p>14 evidence that I had heard before Mary Fanning about</p> <p>15 Smartmatic. That was all over the news with Sidney</p> <p>16 Powell.</p> <p>17 I had an investigator that we had hired --</p> <p>18 well, I guess maybe that was after the fact. But there</p> <p>19 was -- that was all over the news about Smartmatic going</p> <p>20 back to Venezuela. You see that stuff. It was all over</p> <p>21 social media. It was there every night. Dominion and</p> <p>22 Smartmatic, those were the two companies that were</p> <p>23 mostly talked about.</p> <p>24 Q. And the information that you had with respect</p> <p>25 to Smartmatic being involved in rigging the 2020</p>

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<p style="text-align: right;">Page 133</p> <p>1 election was information from Sidney Powell in the news?</p> <p>2 MR. KACHOUROFF: Objection. That's not</p> <p>3 what he said on the record.</p> <p>4 A. No. No, that's --</p> <p>5 MR. KACHOUROFF: Hold on, hold on.</p> <p>6 Objection to form and objection to the word</p> <p>7 "rigging." What do you mean by -- it's vague.</p> <p>8 A. Yeah. What do --</p> <p>9 Q. (BY MS. WRIGLEY) Do you understand the</p> <p>10 question, Mr. Lindell?</p> <p>11 A. This was just stuff I heard. I had not</p> <p>12 validated any of my stuff yet until I got Dennis</p> <p>13 Montgomery's information, and then it was all machine</p> <p>14 companies, any of the computers.</p> <p>15 Q. Okay. Including Smartmatic, correct?</p> <p>16 A. Including Smartmatic.</p> <p>17 Q. Yes.</p> <p>18 A. Do you want to know what I've got now on</p> <p>19 Smartmatic, or are we going to get to that? I mean,</p> <p>20 it's over.</p> <p>21 Q. Mr. Lindell, let me ask you about posting</p> <p>22 "Absolute Proof" to social media. Did you put it up on</p> <p>23 YouTube?</p> <p>24 A. I didn't do -- I didn't do anything as far</p> <p>25 as -- yeah, I guess we put it up on YouTube. I don't</p>	<p style="text-align: right;">Page 135</p> <p>1 three minutes.</p> <p>2 (Exhibit 597 marked.)</p> <p>3 Q. (BY MS. WRIGLEY) So let me hand to you</p> <p>4 Exhibit 597, sir. This is a -- for the record, it's a</p> <p>5 news article.</p> <p>6 A. Uh-huh.</p> <p>7 Q. It's a Mashable article with the heading,</p> <p>8 "MyPillow CEO released a movie pushing election fraud</p> <p>9 conspiracies, YouTube and Vimeo took it down. The film</p> <p>10 is called "Absolutely Proof." It provides zero proof of</p> <p>11 election fraud."</p> <p>12 A. Who wrote -- who wrote this?</p> <p>13 MR. KACHOUROFF: What's the -- did we get</p> <p>14 the exhibit number on this?</p> <p>15 A. Who's Matt Binder? Where did this come from?</p> <p>16 Anybody could write this.</p> <p>17 Q. (BY MS. WRIGLEY) Give me one second, Mr.</p> <p>18 Lindell. For the record --</p> <p>19 MR. KACHOUROFF: Let me ask her one</p> <p>20 question.</p> <p>21 MS. WRIGLEY: The exhibit number is 597.</p> <p>22 Q. (BY MS. WRIGLEY) This is from Mashable. Are</p> <p>23 you familiar with Mashable?</p> <p>24 A. No. Nobody's heard of it. Nobody.</p> <p>25 Q. Do you see at the top -- that's okay. I'll</p>
<p style="text-align: right;">Page 134</p> <p>1 remember who was putting it up. We were just looking</p> <p>2 for a stream that would hold because people -- it was on</p> <p>3 YouTube, and they took it down I think in 45 minutes.</p> <p>4 Q. Did you put it up on Facebook?</p> <p>5 A. What?</p> <p>6 Q. You put it on Facebook, "Absolute Proof"?</p> <p>7 A. It got shut down in like two seconds there, if</p> <p>8 it went on Facebook. I mean, we didn't -- we only</p> <p>9 posted a live stream coming from my michaeljlindell.com.</p> <p>10 That's where it was posted. And you have to -- you have</p> <p>11 to have a streaming platform to put it on to post from</p> <p>12 there.</p> <p>13 I didn't post it anywhere else. I posted</p> <p>14 it right there so people could get it and do their own</p> <p>15 thing.</p> <p>16 So it's like -- it was Michael -- I think</p> <p>17 it was michaeljlindell.com. So you have to have a</p> <p>18 streaming thing there. So it's a -- you know, it's a</p> <p>19 box. People come there to watch it. So you have</p> <p>20 different platforms that are behind it like YouTube</p> <p>21 Vimeo, Rumble.</p> <p>22 Rumble couldn't handle it. It couldn't</p> <p>23 handle the traffic, so it broke. The other ones, we</p> <p>24 think they took it down on purpose. We didn't break</p> <p>25 YouTube. They just took it down. Vimeo took it down in</p>	<p style="text-align: right;">Page 136</p> <p>1 walk you through it, sir.</p> <p>2 The date is February 5th, 2021. Do you see</p> <p>3 under the heading, sir? I'm going to turn to the first</p> <p>4 page -- actually, the second page after your image.</p> <p>5 Do you see where it's -- this article</p> <p>6 states, "Fresh off of receiving multiple Twitter bans,</p> <p>7 MyPillow CEO Mike Lindell is now testing the limits of</p> <p>8 other online platforms. On Friday, Lindell released a</p> <p>9 new documentary titled "Absolute Proof" which claims to</p> <p>10 lay out, well, absolute proof of massive fraud in the</p> <p>11 2020 U.S. presidential election"? Do you see that?</p> <p>12 A. Yeah.</p> <p>13 Q. And you did, in fact, release a documentary</p> <p>14 called "Absolute Proof," correct?</p> <p>15 A. Yes. Yes.</p> <p>16 Q. And that documentary, in fact, claims to lay</p> <p>17 out absolute proof of massive fraud in the 2020 U.S.</p> <p>18 presidential election, correct?</p> <p>19 A. Correct.</p> <p>20 Q. If you go down in the article, it says, "To be</p> <p>21 clear, Lindell's film absolutely does not lay out proof</p> <p>22 of massive fraud in the 2020 election. Instead, it</p> <p>23 rehashes the same tired lies and conspiracy theories of</p> <p>24 President Trump and his high profile supporters, such as</p> <p>25 Rudy Giuliani and Sidney Powell, have pushed for months</p>

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<p style="text-align: right;">Page 137</p> <p>1 in their very unsuccessful legal challenges." Do you</p> <p>2 see that paragraph?</p> <p>3 A. Yeah. Very subjective. I -- who is --</p> <p>4 MR. KACHOUROFF: Hold on. Let her ask the</p> <p>5 question about that.</p> <p>6 THE WITNESS: Yes.</p> <p>7 MR. KACHOUROFF: Objection, hearsay.</p> <p>8 Q. (BY MS. WRIGLEY) Okay. I take it you disagree</p> <p>9 with that paragraph, sir?</p> <p>10 MR. KACHOUROFF: Objection to relevance.</p> <p>11 Why -- how is that even calculated to lead to</p> <p>12 discoverable information?</p> <p>13 A. I mean, that's just an opinion. Of course I</p> <p>14 didn't agree with it.</p> <p>15 Q. (BY MS. WRIGLEY) Okay. Now, if you look at</p> <p>16 the bottom paragraph of this page, do you see where it</p> <p>17 says, "The MyPillow CEO originally uploaded the film to</p> <p>18 Vimeo and embedded the video player on his official</p> <p>19 website. Around an hour after the film was made public,</p> <p>20 Vimeo removed "Absolute Proof" from its platform." Do</p> <p>21 you see that?</p> <p>22 A. Uh-huh.</p> <p>23 Q. And was the video uploaded to Vimeo and then</p> <p>24 subsequently removed?</p> <p>25 A. And it what?</p>	<p style="text-align: right;">Page 139</p> <p>1 Q. Now, below that, the article continues, "The</p> <p>2 video in question has been removed for violating our</p> <p>3 policies relating to the spread of misleading claims</p> <p>4 about the 2020 presidential election and its aftermath,</p> <p>5 explained Vimeo in a statement provided to Mashable."</p> <p>6 "There is no place on the Vimeo platform</p> <p>7 for content that does or can cause harm of any kind."</p> <p>8 Do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Did you have any understanding of whether</p> <p>11 Vimeo --</p> <p>12 MR. KACHOUROFF: Objection, because he said</p> <p>13 he didn't --</p> <p>14 MS. WRIGLEY: Hold on. Hold on. I haven't</p> <p>15 finished my question.</p> <p>16 MR. KACHOUROFF: I have an objection to</p> <p>17 this whole line of inquiries, first.</p> <p>18 MS. WRIGLEY: That's fine. You can object.</p> <p>19 Just let me get my question out.</p> <p>20 A. I can't answer --</p> <p>21 MR. KACHOUROFF: What was your question?</p> <p>22 Q. (BY MS. WRIGLEY) Do you have any understanding</p> <p>23 of whether Vimeo took the "Absolute Proof" video down</p> <p>24 for violating its policies relating to the spread of</p> <p>25 misleading claims about the 2020 presidential election?</p>
<p style="text-align: right;">Page 138</p> <p>1 Q. Was the "Absolute Proof" video uploaded to</p> <p>2 Vimeo and then subsequently removed?</p> <p>3 A. Yes.</p> <p>4 Q. And do you understand why?</p> <p>5 A. I don't know why. Either they didn't</p> <p>6 like the --</p> <p>7 MR. KACHOUROFF: No. No. That's all you</p> <p>8 have to answer.</p> <p>9 A. Yeah, I don't know. I don't know.</p> <p>10 Q. (BY MS. WRIGLEY) Now, if you go to the next</p> <p>11 page, do you see where there's an image of "Absolute</p> <p>12 Proof" and then a black box where it says, "Sorry, this</p> <p>13 video does not exist"?</p> <p>14 A. Yes.</p> <p>15 Q. And below that image it says, "A screenshot of</p> <p>16 Lindell's website after Vimeo removed his "Absolute</p> <p>17 Proof" video." Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall seeing this on your website after</p> <p>20 Vimeo took it down?</p> <p>21 A. I was probably busy, but I've seen a lot of</p> <p>22 stuff that would be down, and then we -- the tech guys</p> <p>23 were putting it up. But you're just pulling a streaming</p> <p>24 company. It's not like you put it up there. You have</p> <p>25 to have it a streaming company, so...</p>	<p style="text-align: right;">Page 140</p> <p>1 MR. KACHOUROFF: Objection.</p> <p>2 A. I --</p> <p>3 MR. KACHOUROFF: Hold on, Mike.</p> <p>4 THE WITNESS: Yeah.</p> <p>5 MR. KACHOUROFF: Objection. Not only</p> <p>6 hearsay and relevance, but he testified that he never</p> <p>7 saw this article, and you're quoting things out of the</p> <p>8 article as though it's a -- you can't ask him questions</p> <p>9 about what the article says if he's never seen it</p> <p>10 before. That's not asking him about facts. If you want</p> <p>11 to ask questions about what Vimeo took down --</p> <p>12 MS. WRIGLEY: My question stands. You</p> <p>13 don't object --</p> <p>14 MR. KACHOUROFF: No. Then don't answer,</p> <p>15 Mike. Don't answer that question.</p> <p>16 MS. WRIGLEY: I'm going to -- are you --</p> <p>17 MR. KACHOUROFF: I'm going to direct him</p> <p>18 not to answer because you're not -- all you have to do</p> <p>19 is rephrase the question and say, "Hey, did Vimeo take</p> <p>20 the video down?" He's already testified that it has.</p> <p>21 Q. (BY MS. WRIGLEY) Mr. Lindell, are you going to</p> <p>22 follow your counsel's instruction?</p> <p>23 A. Well, here's what I want to say: Vimeo,</p> <p>24 Rumble, all these were -- Rumble, when they took it</p> <p>25 down, we didn't change -- we asked them what was</p>

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<p style="text-align: right;">Page 141</p> <p>1 happening, and they said too many people came and broke 2 it. I have no idea if they took it down for their 3 policy or if it was broken. We kept switching to a 4 stream that would hold. That was the main thing back 5 then. It wasn't that it violated some policy at Vimeo. 6 That was my understanding at the time. 7 We just kept putting up stream after 8 stream, every stream that was out there, and we know for 9 sure because we got ahold of Rumble and said, you know, 10 "Did something happen?" 11 They go, "Yeah, you broke it. Too many 12 people." 13 Q. In February of 2021, did you have an 14 understanding of whether Vimeo took your "Absolute 15 Proof" documentary down for violating any of its 16 policies? 17 A. No. I just knew they took it down. 18 Q. Okay. 19 A. We did not know exactly why. 20 Q. Let me ask you about YouTube. Did you have an 21 understanding whether "Absolute Proof" was removed from 22 YouTube for violating any policies related to 23 presidential election and tampering? 24 A. No, because it was up on YouTube for quite a 25 long time, and we thought maybe too many people came</p>	<p style="text-align: right;">Page 143</p> <p>1 removed this video in accordance with this policy." Do 2 you see that, sir? 3 A. Yep. 4 Q. Okay. Were you aware in February of 2021 that 5 YouTube removed Absolute Proof because it advanced false 6 claims about fraud in the 2020 presidential election? 7 A. No. No. Same as Vimeo. 8 Q. Okay. What about for Twitter? Did Twitter 9 take down the Absolute Proof documentary? 10 A. Twitter, I was banned before that, as you know. 11 Q. Okay. 12 A. Twitter, I was banned because I used 13 MyPillow's -- if you remember, the NewsMax guy took off 14 his microphone right on air. Because they wouldn't let 15 me say why I was banned. And they wouldn't let me 16 say -- "Oh, you're getting cancelled, you're cancelled," 17 but none of the TV stations would let me say why are you 18 getting cancelled. 19 Q. Mr. Lindell, was the "Absolute Proof" 20 documentary put up on Gab? 21 A. I didn't put up anything but MyPillow.com. You 22 understand that, right? 23 Q. Uh-huh. I do. 24 A. I put it on MyPillow, michaeljlindell.com. 25 That's where I put it. If other people came there and</p>
<p style="text-align: right;">Page 142</p> <p>1 there, too. That was my understanding at the time, we 2 kept breaking, breaking. I know -- I know now that they 3 took it down for censor. Because later on, I put up 4 on my own stuff about -- I did a speech in a church 5 about Jesus, and Vimeo took down our whole website one 6 time. This was late 2020, I believe, or late 2021. 7 Late 2021. They said we don't ever want anything up 8 there about Jesus or whatever again to mix with 9 MyPillow. 10 So that was something I learned about 11 Vimeo, and this was in a speech I did in church about 12 addiction and Jesus Christ. And they took it down for 13 that. So then I assumed, well, if they did that, I 14 guarantee you back then they took this down because they 15 had a hidden agenda. 16 Q. Can you go to the next page of the exhibit, 17 Mr. Lindell. Do you see where it says, "However, the 18 misspelling in the title of the film was eventually 19 corrected. A few hours later, Lindell's film was also 20 removed by YouTube. In a statement to Mashable, the 21 Google-owned platform said, 'Per our presidential 22 election integrity policy, we remove content uploaded 23 after the safe harbor deadline that advances false 24 claims that widespread fraud, errors or glitches changed 25 the outcome of the 2020 U.S. presidential election. We</p>	<p style="text-align: right;">Page 144</p> <p>1 took it and put it on Gab, that's their business. 2 Q. Did you do anything to post the Absolute Proof 3 documentary on Gab? 4 A. No. I put it on michaeljlindell.com. I don't 5 know. I'd to have with look back. I don't know if I 6 even had a Gab account back then. 7 Q. Did you do anything to put the "Absolute Proof" 8 documentary on Rumble? 9 A. No. 10 Q. Did you do anything to put the "Absolute Proof" 11 documentary on GETTR? 12 A. I didn't do anything. They were doing it -- 13 the tech guys were doing that to keep the stream 14 running. 15 Q. Okay. Can you flip to a page that's got an 16 image in the middle that says "Timothy Burke"? Are you 17 there, sir? Right above there, do you see where it 18 says, "Lindell also paid for"? Are you with me? 19 A. "The video has found a home on right wing 20 platforms like Gab, CloutHub." I didn't have CloutHub 21 account. 22 MR. KACHOUROFF: Hold on. She can't -- 23 THE WITNESS: Okay. 24 MR. KACHOUROFF: Take your time. 25 THE WITNESS: No, I'm just reading it.</p>

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<p style="text-align: right;">Page 145</p> <p>1 Q. (BY MS. WRIGLEY) Sir, do you see where it</p> <p>2 says, "Lindell also paid for multiple hours long</p> <p>3 advertising spots on the conservative cable channel One</p> <p>4 America News Network, OANN, according to the network,</p> <p>5 where the film will be played in full throughout the</p> <p>6 day"?</p> <p>7 A. Okay. Let's go back to the first thing. If</p> <p>8 you read this here, "Throughout the day, third</p> <p>9 parties have consistently" --</p> <p>10 MR. KACHOUROFF: All right, Mike. Mike,</p> <p>11 let her ask the question.</p> <p>12 THE WITNESS: But that was the first</p> <p>13 question. She asked if I put it on Clouthub. It says</p> <p>14 right here --</p> <p>15 MR. KACHOUROFF: But this is -- this is --</p> <p>16 THE WITNESS: -- third parties --</p> <p>17 MR. KACHOUROFF: I got it, Mike. Mike, let</p> <p>18 her ask the questions. Answer her questions.</p> <p>19 A. The other question -- what's -- your question</p> <p>20 about advertising spots, that's not true. But go ahead.</p> <p>21 Q. (BY MS. WRIGLEY) Okay. Well, let me -- let me</p> <p>22 just focus your attention so I have a clear record,</p> <p>23 Mr. Lindell.</p> <p>24 Do you see where this article states,</p> <p>25 "Lindell also paid for multiple hours long advertising</p>	<p style="text-align: right;">Page 147</p> <p>1 A. After it aired, yeah. And people called me and</p> <p>2 said, "Why is that there?"</p> <p>3 I said, "I have no idea."</p> <p>4 Q. In February of 2021, did you want to do media</p> <p>5 interviews or appearances and discuss voting machines,</p> <p>6 including Smartmatic voting machines?</p> <p>7 A. On which day?</p> <p>8 Q. In February of 2021.</p> <p>9 A. After February 5th?</p> <p>10 Q. Uh-huh.</p> <p>11 A. Not one media outlet called me for almost</p> <p>12 15 days, and to the point where I had to ask Dominion's</p> <p>13 company to sue me because no one -- no -- the media went</p> <p>14 completely silent on me, and I could not get the word</p> <p>15 out our country has to get rid of these electronic</p> <p>16 voting machines. I could not get the word out. It</p> <p>17 wasn't about the 2020 election any more. This was about</p> <p>18 saving our country. And the media went silent on me for</p> <p>19 at least 12 days.</p> <p>20 Finally, I had to call back Swin. And I</p> <p>21 called up Swin from The Daily Beast. I said, "Swin," I</p> <p>22 said, "Why don't you be a real journalist and go tell</p> <p>23 Dominion to sue me."</p> <p>24 All the evidence I had, I wanted them to</p> <p>25 sue me so we could show them the -- show the world the</p>
<p style="text-align: right;">Page 146</p> <p>1 spots on the conservative cable channel One America News</p> <p>2 Network, OANN, according to the network, where the film</p> <p>3 will be played in full throughout the day"? Do you see</p> <p>4 that?</p> <p>5 A. Yeah.</p> <p>6 Q. Okay. Did you pay for "Absolute Proof" to be</p> <p>7 played on One America News Network?</p> <p>8 A. I believe they charged me to play it, yes.</p> <p>9 Q. And how many times did it play on One America</p> <p>10 News?</p> <p>11 A. I have no idea. I think it was once, and</p> <p>12 I was -- it was like a watch it, and then I would</p> <p>13 interviewed in between. I think it was one day. I flew</p> <p>14 out there for one day.</p> <p>15 Q. Okay. And did you understand that OAN would</p> <p>16 broadcast a disclaimer in connection with playing</p> <p>17 "Absolute Proof" documentary?</p> <p>18 A. No, I did not. That was a complete surprise.</p> <p>19 Q. When did you find out that OAN would be putting</p> <p>20 up a disclaimer in connection with --</p> <p>21 A. After I watched it. After it was on. And</p> <p>22 people go, "Why did they put that up for?"</p> <p>23 I go, "I have no idea."</p> <p>24 Q. You have seen -- you did see the disclaimer,</p> <p>25 though, after it aired on OAN?</p>	<p style="text-align: right;">Page 148</p> <p>1 evidence, because the media wasn't even attacking me.</p> <p>2 It wasn't even talking about it. It was silence. And</p> <p>3 it was like everything -- it was the only article I</p> <p>4 received on "Absolute Proof," by the way.</p> <p>5 The media went silent. They didn't call me</p> <p>6 up and say, "Hey, your thing is false." No. They went</p> <p>7 silent.</p> <p>8 So that -- two things happened. When I</p> <p>9 told Swin, I said, "Go tell Dominion to sue me; be a</p> <p>10 real journalist," he goes, "Okay, I will."</p> <p>11 THE COURT REPORTER: Slow down, please.</p> <p>12 THE WITNESS: Okay.</p> <p>13 A. He says, "Okay, I will."</p> <p>14 So he went over and said -- to Dominion.</p> <p>15 He called me back. He said, "Yep, Dominion's going to</p> <p>16 sue you."</p> <p>17 And I said, "Okay." I said, "Why don't you</p> <p>18 write an article about it," so he did.</p> <p>19 Three days later, Dominion still had not</p> <p>20 sued me. So I called up Swin, and I said, "Swin, why</p> <p>21 don't you go tell them chop, chop. You're going to be</p> <p>22 known as fake news."</p> <p>23 And Swin, he goes, "Okay, I'll go tell</p> <p>24 them."</p> <p>25 And they did, they sued me then. So then</p>

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<p style="text-align: right;">Page 149</p> <p>1 we were able to take all the evidence and give it to</p> <p>2 Dominion. And I thought it would end then; it would be</p> <p>3 over.</p> <p>4 And then that's the -- that's kind of the</p> <p>5 birth of FrankSpeech, because I go, wow, if they want to</p> <p>6 silence me about talking about securing our elections,</p> <p>7 they're just not going to attack me any more or not talk</p> <p>8 to me or not slander me or not go after MyPillow, which</p> <p>9 by that time we had already lost about \$150 million in</p> <p>10 less than a month per year, just (oral noise).</p> <p>11 And then I went on Jimmy Kimmel --</p> <p>12 Q. Sir, let me ask a question.</p> <p>13 A. Yeah.</p> <p>14 Q. You said by that time you had lost money. By</p> <p>15 what time? By February 5th, 2021, you had lost that</p> <p>16 money?</p> <p>17 A. Yeah, because all the box stores had been</p> <p>18 cancelling all the way through January and into February</p> <p>19 to the tune of two a day, and these were -- they were --</p> <p>20 we were their number one selling product of all time,</p> <p>21 and it was like every, every, every day, two more, two</p> <p>22 more, two more. It started with H-E-B.</p> <p>23 And these were bots and trolls attacking</p> <p>24 them. And I told their CEOs and CMOs, I said, "You</p> <p>25 guys, these aren't the real people."</p>	<p style="text-align: right;">Page 151</p> <p>1 county. Would Mike really be sounding an alarm if his</p> <p>2 friend Donald Trump had been selected --</p> <p>3 Q. Mr. Lindell --</p> <p>4 A. -- and they all said, "Absolutely, he would."</p> <p>5 Q. Mr. Lindell, when was that appearance on Jimmy</p> <p>6 Kimmel?</p> <p>7 A. That was in -- I think it was in March of --</p> <p>8 March of '21.</p> <p>9 Q. That was after the "Absolute Proof"</p> <p>10 documentary, correct?</p> <p>11 A. Uh-huh.</p> <p>12 Q. Okay. So before the "Absolute Proof"</p> <p>13 documentary --</p> <p>14 A. Right.</p> <p>15 Q. -- were you talking about Smartmatic publicly</p> <p>16 in connection with any attack in connection with the</p> <p>17 2020 election?</p> <p>18 A. I was talking about election -- election</p> <p>19 machines. I don't know if I mentioned Smartmatic. All</p> <p>20 electronic machines.</p> <p>21 What I said was, "You guys, we have to get</p> <p>22 rid of these," because all of the -- all of the states</p> <p>23 that I found that people voted that didn't live there,</p> <p>24 so I was done with computers. I was very adamant.</p> <p>25 Every -- every -- as I would go on shows --</p>
<p style="text-align: right;">Page 150</p> <p>1 I said, "They're" -- I said, "These are</p> <p>2 attack groups."</p> <p>3 And some were saying, "Well, can you just</p> <p>4 be quiet about this?"</p> <p>5 You know, and I said, "No. We're" -- "we</p> <p>6 have to have secure our elections."</p> <p>7 This is -- and we lost in a three-week</p> <p>8 period, it's about \$150 million just that year. But</p> <p>9 every year since, we can't get any of them back.</p> <p>10 Q. And prior to February 5th, 2021 and sort of</p> <p>11 talking about the attacks, were you identifying or</p> <p>12 mentioning Smartmatic in connection with --</p> <p>13 A. Was I what?</p> <p>14 Q. Were you identifying or mentioning Smartmatic</p> <p>15 in those discussions prior to January and --</p> <p>16 A. No. I said all voting machines. I said we got</p> <p>17 to get rid of the electronic machines.</p> <p>18 If you remember, when I was on Jimmy</p> <p>19 Kimmel, Jimmy Kimmel asked me, he said, "Mike, if your</p> <p>20 Don" -- "if your friend Donald Trump had been selected</p> <p>21 like you say Biden was, would you still be sounding the</p> <p>22 alarm?"</p> <p>23 I said, "Absolutely."</p> <p>24 The Washington Post and Politico came back</p> <p>25 to Minnesota. They questioned people all around my</p>	<p style="text-align: right;">Page 152</p> <p>1 as I would go on shows, they would say, "Oh, you're</p> <p>2 getting cancelled," but they wouldn't let me talk about</p> <p>3 why I was getting cancelled, because our company had</p> <p>4 been attacked by China. There had been a breach by</p> <p>5 China, and I had mentioned that. I had mentioned all</p> <p>6 machines. I didn't pick out a single -- I wish I had</p> <p>7 said ES&S. They're all the same.</p> <p>8 Q. Okay. So now, let me ask you about right after</p> <p>9 "Absolute Proof." Did you appear on Steve Bannon's War</p> <p>10 Room podcast to discuss the documentary shortly after</p> <p>11 February 5th?</p> <p>12 A. I don't know. I don't know.</p> <p>13 Q. Okay.</p> <p>14 A. The first time I believe I ever was on Bannon,</p> <p>15 but that could be wrong, was when Dominion sued me.</p> <p>16 Q. Shortly after "Absolute Proof" was taped on</p> <p>17 February 5th, 2021, did you discuss Smartmatic with</p> <p>18 Steve Bannon on his War Room podcast?</p> <p>19 A. If anything -- I have no idea.</p> <p>20 Q. Okay. I'm going to show you another exhibit.</p> <p>21 This one's been previously marked as Exhibit 432. It's</p> <p>22 been used at another deposition. This clip is a little</p> <p>23 bit longer than the last one.</p> <p>24 A. Okay.</p> <p>25 Q. My colleague's going to come over here and play</p>

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<p style="text-align: right;">Page 153</p> <p>1 it, and it's a little over seven minutes. And then I'll</p> <p>2 ask you some questions about it.</p> <p>3 (Clip of Steve Bannon and Mike Lindell.)</p> <p>4 STEVE BANNON: Dr. Ming from London tells</p> <p>5 us about that competition. It's about the Chinese</p> <p>6 Communist Party being the existential threat, the</p> <p>7 existential enemy of the Chinese people, of the American</p> <p>8 people, and of all mankind. We've seen this from the</p> <p>9 CCP virus that came out of Wuhan Lab.</p> <p>10 We're now joined, it looks like, from a</p> <p>11 very exclusive club in -- somewhere in Palm Beach,</p> <p>12 Florida. Been up all night, the great Mike Lindell.</p> <p>13 Mike Lindell has made a film that looks like a two-hour</p> <p>14 movie that's playing in a loop on One America News.</p> <p>15 I think it's up on Gab TV. It's called "Absolute</p> <p>16 Proof."</p> <p>17 Mike, here's the first question -- I'm</p> <p>18 going to get to the China Communist Party in a second,</p> <p>19 because I understand this film is very centric on CCP's</p> <p>20 involvement in the 2020 election -- as the director of</p> <p>21 national intelligence, Ratcliffe warned the nation and</p> <p>22 warned the president in late -- in mid-January of this</p> <p>23 year, but I want to go to -- look, Dominion has called</p> <p>24 your guys' bluff. They're suing FOX, which is the</p> <p>25 Murdochs where those tough lawyers over there. They're</p>	<p style="text-align: right;">Page 155</p> <p>1 other -- two sites crashed it. They're trying to attack</p> <p>2 it from every angle.</p> <p>3 You know what? If Dominion and</p> <p>4 Smartmatic -- now, don't forget Smartmatic. They're</p> <p>5 right in there. I think they're the ones that went</p> <p>6 after FOX. They're not coming after me --</p> <p>7 STEVE BANNON: Okay.</p> <p>8 MR. LINDELL: -- because they know it --</p> <p>9 they know this movie's out.</p> <p>10 So I -- you know, I invite you guys, you --</p> <p>11 Dominion and them, come on. Let's talk about -- you</p> <p>12 know, show me what's wrong in this video, because it's a</p> <p>13 hundred percent proof.</p> <p>14 STEVE BANNON: Okay. Now, hang on, hang</p> <p>15 on. I just want to slow down. You're saying all the</p> <p>16 people like the Patrick Byrnes, all these people have</p> <p>17 been discredited as being -- you know, not having facts,</p> <p>18 et cetera. They're not in the film. You've got a new</p> <p>19 cast of characters, experts, subject matter experts.</p> <p>20 But I just want to make sure this is clear.</p> <p>21 You are prepared to sit down -- and we can do it live.</p> <p>22 You're prepared to sit down with Dominion executives and</p> <p>23 their lawyers, have them go through this film with you</p> <p>24 live, and tell you where you're defaming them, tell them</p> <p>25 where you're misrepresenting, tell them where you're</p>
<p style="text-align: right;">Page 154</p> <p>1 suing all operations. I think you've gotten letters or</p> <p>2 you're involved and named in these suits. This doesn't</p> <p>3 double down, it triples down to the tenth power throwing</p> <p>4 down on what they've said. Your movie, "Absolute</p> <p>5 Proof," you don't leave any questions about this.</p> <p>6 Why -- have you reached out to the Dominion</p> <p>7 executives, and have you told them, "Hey, I'm prepared</p> <p>8 to show you this film. I'm prepared here at this</p> <p>9 question, and why would you throw napalm on a burning</p> <p>10 brush fire and do it this weekend before the trial next</p> <p>11 week of President Trump?"</p> <p>12 MR. LINDELL: Well, the first question is</p> <p>13 no, I don't respond to Dominion other than, "Yes, please</p> <p>14 sue me." They sent me a letter yesterday because they</p> <p>15 heard about this documentary. They sent me an E-mail.</p> <p>16 It wasn't from lawyers, it was from them going, "Mike,</p> <p>17 look at all these people that we have here. They're all</p> <p>18 discredited."</p> <p>19 Well, the people I have in this are all</p> <p>20 people that weren't on that list. So this is all the</p> <p>21 new evidence I've been telling everyone. This is what</p> <p>22 they're showing everyone, Steve.</p> <p>23 Just today when this launched this morning,</p> <p>24 we've had over a million people view it, and it's been</p> <p>25 taken down by Vimeo or -- and it's been taken down on</p>	<p style="text-align: right;">Page 156</p> <p>1 just dead factually wrong. Is that what I'm hearing?</p> <p>2 MR. LINDELL: Well, yeah. Because without</p> <p>3 inviting them to, they could come -- they could come</p> <p>4 on -- I'll go on national TV with them and look over --</p> <p>5 we'll go write down what I've got.</p> <p>6 You know, when I put out in this</p> <p>7 documentary, Steve, it's like 1/1000th of what we have.</p> <p>8 It's 100 percent true. You're going to look at any part</p> <p>9 of mine, you hold up, and here it is, and they're going</p> <p>10 to go, huh-uh.</p> <p>11 We have video of them. We have video of</p> <p>12 their CEO and they're -- Dominion jumping in trucks and</p> <p>13 what to do for this election. It's in the video. So I</p> <p>14 don't think they'll show up if I invite them.</p> <p>15 STEVE BANNON: But look, whether they show</p> <p>16 up or not, it's their decision. They've already sued</p> <p>17 in -- I think in federal courts all over the place.</p> <p>18 But I just want to make clear. You're that</p> <p>19 confident that you've got a new set of subject matter</p> <p>20 experts, and you tie this back to actually the CCP being</p> <p>21 involved in this, that you're that confident in what</p> <p>22 you're putting forward, because you've told them before</p> <p>23 you've got nothing, and I'm going to get discovery. I</p> <p>24 just want to make sure, you're that confident that what</p> <p>25 people are going to see is Absolute Proof, and it's only</p>

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<p style="text-align: right;">Page 157</p> <p>1 1/100th of what you've got, that on a live show, you</p> <p>2 would invite the executives of Dominion and their</p> <p>3 lawyers to challenge you, frame by frame, and that you</p> <p>4 could back up what you've got, and you would take on any</p> <p>5 questions they have about how you defamed them and how</p> <p>6 you're essentially lying about them. Is that what I'm</p> <p>7 hearing?</p> <p>8 MR. LINDELL: Well, first of all, you're</p> <p>9 not defaming or lying about anything that's not true.</p> <p>10 You know, that is true. I will bring them on. I will</p> <p>11 do anything. All of them.</p> <p>12 The reason they're suppressing is and the</p> <p>13 reason they haven't sued me -- by the way, a lot of</p> <p>14 those lawsuits are lies. They put it out there to scare</p> <p>15 networks not to talk about it. Okay? That's what</p> <p>16 they're doing.</p> <p>17 And, Steve -- and they're -- and it isn't</p> <p>18 just a different cast of experts. It's the evidence,</p> <p>19 the hard evidence. In this -- in this documentary,</p> <p>20 these are the facts. There's nothing subjective.</p> <p>21 There's no subjectivity. It's all here's the facts.</p> <p>22 Here's what happened on the first, second, third,</p> <p>23 fourth. Here's what happened, each day, a print of what</p> <p>24 happened.</p> <p>25 So, yeah, Dominion, Smartmatic, both of</p>	<p style="text-align: right;">Page 159</p> <p>1 So michaeljindell.com, Google it. People</p> <p>2 are putting it up everywhere, though, on social media</p> <p>3 now, so you shouldn't have any problem.</p> <p>4 And I want to say something. OAN -- OAN</p> <p>5 just sold me that time, and here they took their Twitter</p> <p>6 down yesterday. I just got a -- I got it from their --</p> <p>7 one of -- I heard it from one of their people. For no</p> <p>8 reason. They hadn't even posted anything. Dominion</p> <p>9 knew this was coming or somebody did and took their</p> <p>10 Twitter down.</p> <p>11 Jack Dorsey, you're the next one we'll talk</p> <p>12 about in the next documentary.</p> <p>13 STEVE BANNON: Okay. One last thing. But</p> <p>14 no executive -- they sent you a letter yesterday. We've</p> <p>15 only got a minute left. No executive of Dominion --</p> <p>16 MR. LINDELL: Right.</p> <p>17 STEVE BANNON: -- has reached out to you</p> <p>18 today. This started playing on One America at 10:00</p> <p>19 o'clock when our show came on. When we get off, it's on</p> <p>20 One America running in a loop. It's on Gab TV. It's</p> <p>21 other places.</p> <p>22 That they have not -- I just want to make</p> <p>23 sure we're clear. They have not reached out to you yet</p> <p>24 to talk about what you've now put in this. What you</p> <p>25 say, you show nothing but evidence, you can back it up,</p>
<p style="text-align: right;">Page 158</p> <p>1 you, come on. Can we please include Smartmatic so they</p> <p>2 can sue me, too?</p> <p>3 STEVE BANNON: Sure. Sure. Okay. But</p> <p>4 we've only got two minutes. I want to make sure that --</p> <p>5 how do people -- you say it's being pulled down all over</p> <p>6 the place. I think One America's got it up. One</p> <p>7 America has put a logo at the bottom about how they had</p> <p>8 nothing to do with it. They quoted the time.</p> <p>9 MR. LINDELL: Yeah.</p> <p>10 STEVE BANNON: I think it's on Gab.</p> <p>11 MR. LINDELL: Yeah.</p> <p>12 STEVE BANNON: How can people get -- we've</p> <p>13 got two minutes. How can people see this, and</p> <p>14 particularly, how can the Dominion people see it so they</p> <p>15 can come back if they want and challenge you? How can</p> <p>16 people get access to this?</p> <p>17 MR. LINDELL: All I can say is it's on OAN.</p> <p>18 It's -- you can view it 24/7. You can go to</p> <p>19 michaeljindell.com -- michaeljindell.com, or Google my</p> <p>20 name or Google Absolute Proof.</p> <p>21 It all comes to that site, and they keep</p> <p>22 taking stuff down, and we put -- keep putting it up.</p> <p>23 We've pretty much got it now where you're going to be</p> <p>24 able to watch it, we -- after we got through this</p> <p>25 morning, the big attack.</p>	<p style="text-align: right;">Page 160</p> <p>1 and you would have them come on live and actually</p> <p>2 deconstruct the film in front of the world. They have</p> <p>3 not reached out to you yet, correct?</p> <p>4 MR. LINDELL: That's right. That's right.</p> <p>5 I would love them to come on. Let's do it. We should</p> <p>6 do it on your show, Steven. I'm open at any time.</p> <p>7 Let's -- let's get them on.</p> <p>8 STEVE BANNON: We would welcome. In fact,</p> <p>9 we've reached out to the Dominion guys. I think Michael</p> <p>10 Seals and you have spoken. We want to do this. I think</p> <p>11 it's one of the reasons -- ways to put it to bed, have</p> <p>12 Dominion come back and challenge. And by the way, take</p> <p>13 it apart. That's what the democracy is about.</p> <p>14 If you think Mike Lindell is a liar, if you</p> <p>15 think he's a crank, if you think he's a kook, then come</p> <p>16 on and let's do it live and let's go through it. I</p> <p>17 think it would be fair, and I think a billion people</p> <p>18 would watch it.</p> <p>19 Mike, we've got to jump. You're doing</p> <p>20 God's work. I mean, unbelievable. Mike Lindell,</p> <p>21 ultimate honey badger.</p> <p>22 (Clip ended.)</p> <p>23 Q. (BY MS. WRIGLEY) Mr. Lindell, that's an</p> <p>24 appearance you did with Steve Bannon talking about</p> <p>25 "Absolute Proof" on February 5th --</p>

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<p style="text-align: right;">Page 161</p> <p>1 A. Uh-huh. Yes.</p> <p>2 Q. -- 2001 [sic], correct?</p> <p>3 A. Yes.</p> <p>4 Q. Do you remember doing that appearance with</p> <p>5 Mr. Bannon?</p> <p>6 A. Yes. I did a ton of them back then, but yes.</p> <p>7 Yes.</p> <p>8 Q. And you specifically referenced Smartmatic in</p> <p>9 that appearance with Mr. Bannon, correct?</p> <p>10 A. Yes.</p> <p>11 Q. And you called out Smartmatic?</p> <p>12 A. Yes, I did.</p> <p>13 Q. And you actually asked Smartmatic to sue you in</p> <p>14 that appearance with Steve Bannon, right?</p> <p>15 A. That's right. Just -- just like I did</p> <p>16 Dominion, correct.</p> <p>17 Q. Now, do you understand that Dominion and</p> <p>18 Smartmatic are separate companies?</p> <p>19 A. Well, the information that I had then that I</p> <p>20 got that they were -- they were very much connected with</p> <p>21 the -- with the software called GEMS, and also, you</p> <p>22 know, what I know now and what I knew then is everything</p> <p>23 has been validated as far as Smartmatic.</p> <p>24 I learned just LA County, we got the data</p> <p>25 from there, the cast vote records. Everything validated</p>	<p style="text-align: right;">Page 163</p> <p>1 that they had sued -- I think they had sued FOX by then.</p> <p>2 I can't remember.</p> <p>3 Actually, Smartmatic drew first blood.</p> <p>4 Smartmatic sued Fox News on February 4th, 2021, which</p> <p>5 changed my life forever. That's why I was very upset</p> <p>6 with Smartmatic there.</p> <p>7 Smartmatic, when they did that, I could</p> <p>8 never, ever go on FOX again to sell pillows, NewMax or</p> <p>9 anywhere. I was completely shut out of all places I</p> <p>10 advertised before. So on Salem Media, Fox News and</p> <p>11 NewsMax. After Smartmatic sued -- they drew first blood</p> <p>12 in this big out lawfare, and that's where Smartmatic got</p> <p>13 tied in. This was after February 5th, the show.</p> <p>14 Q. Now, Mr. Lindell --</p> <p>15 A. So that was -- that's what I had against</p> <p>16 Smartmatic. Now I do recall. And that's why I sued</p> <p>17 Smartmatic. I sued Smartmatic first because of what</p> <p>18 they did on February 4th.</p> <p>19 Q. When you did the "Absolute Proof" documentary,</p> <p>20 you were angry at Smartmatic for filing that lawsuit --</p> <p>21 A. No.</p> <p>22 Q. -- against Fox News?</p> <p>23 A. No. It was all part of the thing. I just</p> <p>24 thought, well, that's pretty -- that's -- you know,</p> <p>25 that's pretty perfect. By then, I was losing box stores</p>
<p style="text-align: right;">Page 162</p> <p>1 Dennis Montgomery's data, the evidence I had there, and</p> <p>2 I turned that all into Smartmatic. They have all 32</p> <p>3 terabytes.</p> <p>4 So at this time, they were very much tied</p> <p>5 together. We had hired -- I had already hired people to</p> <p>6 investigate the two of them, how they -- how they're</p> <p>7 connected. Yeah. And yeah.</p> <p>8 So there's -- by that time, it wasn't that</p> <p>9 they were one and the same, but they were -- you could</p> <p>10 throw ES&S in there, all these machines that got hacked.</p> <p>11 Dominion and Smartmatic were very much in the forefront</p> <p>12 at that time, probably because you guys were out running</p> <p>13 around suing people.</p> <p>14 Q. Okay. So at the time you did that appearance</p> <p>15 with Mr. Bannon to talk about "Absolute Proof," you were</p> <p>16 aware that Dominion had filed lawsuits claiming that</p> <p>17 false information had been published about it in</p> <p>18 connection with the 2020 election?</p> <p>19 A. I was well aware of that, and that they had</p> <p>20 sent threatening letters to over 250 citizens that</p> <p>21 looked like Mafia letters I used to get back when I owed</p> <p>22 football bets to the Mafia. These were terrible</p> <p>23 letters, and I thought what an evil company. I was</p> <p>24 aware of these letters. In fact, we had a lawsuit of</p> <p>25 those people suing Dominion for it. And I was aware</p>	<p style="text-align: right;">Page 164</p> <p>1 every day, so it didn't -- it was just all part of the</p> <p>2 pile.</p> <p>3 Q. Did you have an understanding of why Smartmatic</p> <p>4 sued Fox News prior to "Absolute Proof" documentary?</p> <p>5 A. Yeah, I had a good idea, because they were</p> <p>6 trying to do lawfare and suppress all the information</p> <p>7 that they were guilty.</p> <p>8 Q. Are you aware that --</p> <p>9 A. A hundred percent I knew why. That's why</p> <p>10 Smartmatic did that. They started lawfare. It hadn't</p> <p>11 been in our country since 1792. That's why we're here</p> <p>12 today. It's disgusting.</p> <p>13 Q. Mr. Lindell, do you engage in lawfare?</p> <p>14 A. What?</p> <p>15 Q. Do you engage in lawfare?</p> <p>16 A. No. I just have to sit and put up with all</p> <p>17 your stuff. That's all you guys have.</p> <p>18 Q. You sued Smartmatic first, correct?</p> <p>19 A. I sued Smartmatic. My lawyers -- my lawyers at</p> <p>20 the time said we're going to sue Smartmatic because --</p> <p>21 and -- and Dominion sued us -- so that we could bring</p> <p>22 out the evidence to the public. I wanted to get the</p> <p>23 evidence out, because they were suppressing it. You</p> <p>24 guys were suppressing it.</p> <p>25 Fox News ain't going to show it. NewsMax</p>

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<p style="text-align: right;">Page 165</p> <p>1 ain't going to show it. And the Salem Media is 2 certainly not going to show it. And I was the only one 3 with the voice going, "Okay, you know what? We have to 4 get this evidence out there no matter what it takes." 5 And Smartmatic, what they did personally by 6 suing that and I couldn't get on those stations, the 7 lawyer -- this was all on the advice of con lawyers. 8 Q. Mr. Lindell, let me -- I just want to dig into 9 that a little bit. Let me ask you about going on Fox 10 News. 11 Did anybody at Fox News tell you that you 12 could not come on and advertise MyPillow products after 13 that lawsuit by Smartmatic? 14 A. I couldn't come on and talk about MyPillow. I 15 couldn't come on there at all. Before, if I do it -- if 16 I would do it on Fox, NewsMax or Salem Media -- those 17 are my three biggest outlets. 18 If I can't go on and talk about my 19 employees -- I have 4 -- 300 more employees saying we -- 20 and we do big segments on addiction, people -- giving 21 people second chances, people coming to the Lord, people 22 getting saved. My whole thing was all about getting 23 saved, about coming to Jesus for the biggest revival I 24 ever -- I couldn't go on those stations any more after 25 February 4th, what Smartmatic did to Fox News.</p>	<p style="text-align: right;">Page 167</p> <p>1 certainly have come forward and said, look at ours. 2 We're not suing anybody. There's no rocks or knives in 3 our product. But no. 4 ES&S, I was with them in a Senate hearing, 5 and you know what they said? Are your machines more 6 secure than Smartmatic or Dominion? He said no. All 7 machines have back doors and they're all vulnerable 8 and-- 9 Q. (BY MS. WRIGLEY) Mr. Lindell, let me ask you 10 this: By February 4, 2021, had a number of big box 11 stores dropped MyPillow products? 12 A. Yeah. Yes. 13 Q. Okay. 14 A. And this and a majority of -- 15 Q. And that was prior to Smartmatic filing a 16 lawsuit against Fox News, correct? 17 A. Right. That's when I was out there telling 18 them we got to get rid of all machines. 19 Q. Okay. 20 A. That's correct. 21 Q. So those decisions by the big box stores had 22 nothing to do with that lawsuit that Smartmatic did 23 against Fox News -- 24 (Crosstalk.) 25 A. No. The -- no. You guys -- you guys were</p>
<p style="text-align: right;">Page 166</p> <p>1 Everybody got scared. Mike Lindell's 2 talking about election platform. We can't have him on 3 even to talk about MyPillow, but -- and the same thing 4 with the cancelled box stores and all this stuff. I 5 couldn't go on after that, after you guys did what you 6 did because I couldn't go on and say why I was 7 cancelled. They wouldn't even have me on when -- "Hey, 8 you just lost six more box stores. Your company's in 9 debt and just getting plummeled [sic], and you're going 10 to lose your company. How do you feel?" 11 Well, you want to know why it's happening? 12 Because these companies -- well, you know, it's like I 13 said. This is what I said -- 14 THE COURT REPORTER: Will you please slow 15 down. 16 THE WITNESS: Okay. 17 A. I said, you know, for me at that time -- and I 18 think I've said it many times -- if I was a company 19 and I -- a pillow company out there, and everyone said 20 there's rocks and knives in pillows -- in MyPillow's, 21 number one, I wouldn't sue people. I would say no, 22 there's not. Look inside. Here's what I have to show. 23 But no company would do that. Not you guys, not 24 Dominion, not anyone. 25 And if I'd have been ES&S, I would</p>	<p style="text-align: right;">Page 168</p> <p>1 the -- the -- 2 THE COURT REPORTER: I can only take one at 3 a time. 4 A. The box stores, whatever their decisions were, 5 was because I was speaking out with the election and the 6 machine. You guys specifically did all the damage, more 7 damage because I couldn't go on my -- the revenue that 8 you cost us because I could no longer go on Salem Media, 9 it was huge. 10 I was on podcasts all the time 11 talking about MyPillow and talking about our policies 12 there. I'm giving people -- it's the American dream on 13 steroids. I was an ex-crack addict. We -- this -- I 14 would go on there and tell story after story, and we 15 would sell product just talking about God and talking 16 about our employees. The American dream. Everything 17 made here, I could not do that after February 4th to 18 this day because of what you guys did. 19 Q. (BY MS. WRIGLEY) In 2021, did MyPillow spend 20 money on advertising? 21 A. We spend money every year on advertising. 22 Q. Okay. And so MyPillow was still able to 23 advertise their products on podcasts in 2021, correct, 24 sir? 25 A. That's correct.</p>

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<p style="text-align: right;">Page 169</p> <p>1 Q. Okay.</p> <p>2 A. And we were still able to advertise on CNN, on</p> <p>3 FOX, on everybody, yes.</p> <p>4 Q. In 2021, correct?</p> <p>5 A. Yes.</p> <p>6 Q. So you were still able to pay for TV stations</p> <p>7 and revenue splits with podcasters and radio stations to</p> <p>8 advertise MyPillow products after Smartmatic filed that</p> <p>9 lawsuit --</p> <p>10 A. Oh, no.</p> <p>11 Q. -- against FOX?</p> <p>12 A. A lot of -- a lot of podcasters dropped us</p> <p>13 because of what you guys did.</p> <p>14 Q. Mr. Lindell, just before we keep going, I would</p> <p>15 just ask that we slow down a little bit.</p> <p>16 A. Okay.</p> <p>17 Q. We're talking past each other. So let's just</p> <p>18 slow down. Listen to my questions. Okay?</p> <p>19 A. That's not -- okay. That's not true. A lot of</p> <p>20 podcasters dropped us after you guys sued FOX.</p> <p>21 Q. Okay.</p> <p>22 A. A lot of them did, couldn't --</p> <p>23 Q. And did they drop you because they were nervous</p> <p>24 that you were going to come on and accuse Smartmatic of</p> <p>25 rigging the 2020 election, sir?</p>	<p style="text-align: right;">Page 171</p> <p>1 "Absolute Proof," "Absolute Interference" --</p> <p>2 A. Yeah.</p> <p>3 Q. -- "Scientific Proof" in 2021 to get back at</p> <p>4 Smartmatic because of the lawsuit you're talking about?</p> <p>5 A. Absolutely not. I did it to save our country</p> <p>6 and to get rid of these electronic voting machines and</p> <p>7 go to paper ballots hand counted. Hundred percent,</p> <p>8 every single -- it didn't matter what happened. That's</p> <p>9 exactly what I did, 18 hours a day for three years.</p> <p>10 Q. Okay. After that appearance that we watched on</p> <p>11 Steve Bannon and War Room show from February 5th, did</p> <p>12 you appear again on Steve Bannon's War Room --</p> <p>13 A. I have no --</p> <p>14 Q. -- to talk about "Absolute Proof"?</p> <p>15 A. -- no -- I have no idea.</p> <p>16 Q. Okay. I'm going to show you another video</p> <p>17 clip, sir.</p> <p>18 A. Okay.</p> <p>19 MS. WRIGLEY: This one's going to be marked</p> <p>20 as Exhibit 598.</p> <p>21 (Exhibit 598 marked.)</p> <p>22 Q. (BY MS. WRIGLEY) This is a clip from the</p> <p>23 February 6, 2021 Steve Bannon's War Room show. This one</p> <p>24 should be just a couple minutes. So I'll let my</p> <p>25 colleague get that set up, and then we'll watch it, and</p>
<p style="text-align: right;">Page 170</p> <p>1 A. No. I'm -- you've asked me a -- I'm talking</p> <p>2 about the appearances. I'm talking about -- you said</p> <p>3 just buy ads. I -- they wouldn't do the ads any more,</p> <p>4 the ads. Not Dominion making an appearance. You guys</p> <p>5 put the kibosh on that.</p> <p>6 And of course, they would not let me come</p> <p>7 on and talk about -- when I would go on and tell them</p> <p>8 about my employees and stuff, our sales would skyrocket.</p> <p>9 That was all destroyed, and it has been.</p> <p>10 The money that's cost us now is in the</p> <p>11 hundreds of millions, probably, hundred -- at least a</p> <p>12 hundred million. All the -- all of the media, I could</p> <p>13 not go on there and tell. It's like a story. When you</p> <p>14 tell that, your sales go up for a month, and I couldn't</p> <p>15 do that.</p> <p>16 But you also caused for podcasters,</p> <p>17 especially on Salem Media, that -- these TV shows and</p> <p>18 podcasters, and I would say half of them dropped us from</p> <p>19 even doing their MyPillow reads because they were afraid</p> <p>20 of getting sued just for doing MyPillow reads.</p> <p>21 I had some podcaster go, well, I can't do</p> <p>22 your reads any more, Mike. We can't do MyPillow</p> <p>23 because, you know, we could get sued, too, because look</p> <p>24 at the -- and I hadn't been sued yet.</p> <p>25 Q. Mr. Lindell, did you do the documentary series</p>	<p style="text-align: right;">Page 172</p> <p>1 I'll ask you some questions about it.</p> <p>2 (Clip of Steve Bannon and Mike Lindell.)</p> <p>3 STEVE BANNON: And the disclaimer is -- and</p> <p>4 I'd like to just talk a second about that disclaimer. I</p> <p>5 take it since you bought the time, did you want the</p> <p>6 disclaimer up? Did you talk to the One America guys?</p> <p>7 Is that really your -- did you drive that to make sure</p> <p>8 that disclaimer was up there?</p> <p>9 MR. LINDELL: No. I -- again, I said</p> <p>10 whatever you guys need to do because, you know, at least</p> <p>11 they're brave enough to go out there and put this out</p> <p>12 there, because you have places -- every other cable</p> <p>13 comp -- cable channel is not going to put this out there</p> <p>14 because why? Because Smartmatic and Dominion sued them</p> <p>15 or threatened to sue them. I mean, it's now funny that</p> <p>16 they have perfect timing that Smartmatic comes in, sues</p> <p>17 FOX yesterday and gets rid of Lou Dobbs.</p> <p>18 I mean, this is just -- it's -- how brave</p> <p>19 of OAN to do that. And I said, you know, put something</p> <p>20 out there so it protects you and so that they know it's</p> <p>21 coming from me. It doesn't mean the evidence is -- the</p> <p>22 evidence is one hundred percent true. That's why it's</p> <p>23 called "Absolute Proof."</p> <p>24 STEVE BANNON: Okay.</p> <p>25 (Clip ends.)</p>

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<p style="text-align: right;">Page 173</p> <p>1 Q. (BY MS. WRIGLEY) Do you recall appearing on</p> <p>2 Steve Bannon's podcast to talk again about "Absolute</p> <p>3 Proof" documentary and Smartmatic?</p> <p>4 A. No. No. But I did. It's a -- you mean</p> <p>5 this --</p> <p>6 Q. And was that your voice, Mr. Lindell?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And that was Mr. Bannon's voice?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. And you referenced Smartmatic --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- in connection with that appearance, correct?</p> <p>13 A. (Witness indicated by nodding his head</p> <p>14 affirmatively.)</p> <p>15 Q. Okay. I'm going to show you another clip from</p> <p>16 that same show. This is just a couple minutes. And</p> <p>17 again, this is the Bannon's War Room from February 6,</p> <p>18 2021.</p> <p>19 MS. WRIGLEY: This one will be marked</p> <p>20 Exhibit 599.</p> <p>21 (Exhibit 599 marked.)</p> <p>22 (Clip of Steve Bannon and Mike Lindell.)</p> <p>23 MR. LINDELL: Right. But you're incorrect</p> <p>24 on one thing. Dominion has not sued me. I don't even</p> <p>25 think they've threatened to sue me. They've sent me</p>	<p style="text-align: right;">Page 175</p> <p>1 you over the break. What grounds would you sue them on?</p> <p>2 MR. LINDELL: I guess -- you know, I don't</p> <p>3 know that yet. It would be crimes against our country</p> <p>4 that they used their -- that they -- lies, you know,</p> <p>5 their machines were all online. We've got them saying</p> <p>6 they don't go online, and they -- it's right in their</p> <p>7 manual that they go online. We've got proof that they</p> <p>8 were online. We've got all the evidence.</p> <p>9 So it would be a -- you know, I don't know.</p> <p>10 I actually have lawyers looking at that right now, what</p> <p>11 can be charged. In fact, Steve, the next time I'm on</p> <p>12 your show, I guarantee you I'll have those charges</p> <p>13 against Dominion, so...</p> <p>14 (Clip ends.)</p> <p>15 Q. (BY MS. WRIGLEY) Mr. Lindell, do you recall</p> <p>16 appearing and having that discussion with Mr. Bannon on</p> <p>17 his War Room podcast?</p> <p>18 A. That's my voice.</p> <p>19 Q. Okay. And that was Mr. Bannon's voice?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And as part of that appearance, you</p> <p>22 discussed Smartmatic, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And you also discussed Dominion, correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 174</p> <p>1 letters like, Mike, in your documentary, a few of these</p> <p>2 people in there, this isn't real. John, let us know</p> <p>3 who's going to be in your documentary. So I -- my reach</p> <p>4 out is -- and then I got the other letter that said you</p> <p>5 have been warned, you know, like I'm -- some Mafia</p> <p>6 letter from back when I was a kid, you know. So they</p> <p>7 don't -- they haven't sued me, Steve.</p> <p>8 Here's the deal. I will take them. You're</p> <p>9 exactly right. Bring the media there. I don't care how</p> <p>10 long. I'll sit there for a week with you. We'll do it</p> <p>11 every day. We'll make it like a little trial thing.</p> <p>12 Because if you don't, let me tell you what</p> <p>13 I'm doing, I am going after Dominion and Smartmatic.</p> <p>14 I'm going after them with a lawsuit if this does not</p> <p>15 come out to the public and they all get exposed and</p> <p>16 then -- and show what happened in our election, because</p> <p>17 it's going to get out there or my next step is I sue</p> <p>18 Dominion, and when I sue Dominion, it has to come out in</p> <p>19 court. And I'll make sure that that's public. So</p> <p>20 either do it now -- let's just do it now and save time.</p> <p>21 How about it, Dominion? How about it?</p> <p>22 STEVE BANNON: So can I ask you, Mike, what</p> <p>23 would you sue -- what grounds would you sue Dominion and</p> <p>24 Smartmatic on? You said you're going to sue them. What</p> <p>25 grounds -- we've got about a minute, and then we'll hold</p>	<p style="text-align: right;">Page 176</p> <p>1 Q. You asked Dominion -- or you expressed interest</p> <p>2 in having -- in suing Dominion, correct?</p> <p>3 A. Uh-huh.</p> <p>4 Q. You expressed interest in suing Smartmatic,</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 A. Got to get the evidence out, correct.</p> <p>9 Q. Okay. And you identified Smartmatic as being</p> <p>10 involved in crimes against our country, correct?</p> <p>11 A. That's right.</p> <p>12 Q. And you did, in fact, later file a lawsuit</p> <p>13 against Smartmatic, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. And at that point in time, Smartmatic had not</p> <p>16 sued you, correct?</p> <p>17 A. That's correct.</p> <p>18 Q. Had Smartmatic sent any what you call</p> <p>19 threatening letters against you, Mr. Lindell?</p> <p>20 A. No. They just hurt MyPillow. In fact, it was</p> <p>21 crushing my company.</p> <p>22 Q. And when you say "hurt MyPillow," you mean</p> <p>23 by -- on February 4th, two days before those podcasts,</p> <p>24 filing a lawsuit --</p> <p>25 A. Started lawfare.</p>

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<p style="text-align: right;">Page 177</p> <p>1 Q. -- against Fox News, correct?</p> <p>2 A. That's correct.</p> <p>3 Q. Lawfare, right?</p> <p>4 A. Uh-huh. Uh-huh.</p> <p>5 Q. But in this podcast, you're actually also</p> <p>6 talking about engaging in lawfare, too, correct, sir?</p> <p>7 A. No.</p> <p>8 Q. I mean, lawfare is filing a lawsuit, right?</p> <p>9 A. Oh. Is that what you call it?</p> <p>10 Q. That's what I'm asking you.</p> <p>11 A. Lawfare is going after people and running them</p> <p>12 out of money so they're afraid to get sued, so they</p> <p>13 cower down. I've been involved in this -- you guys have</p> <p>14 ran MyPillow dry. You've ran Mike Lindell dry. You've</p> <p>15 ran other companies dry. That's your game you play.</p> <p>16 I was just involved -- you see me call that</p> <p>17 other lawyer a whatever. That was done because that --</p> <p>18 Q. I don't think there's a need for that,</p> <p>19 Mr. Lindell.</p> <p>20 A. -- that was because -- because back then this</p> <p>21 judge made a thing -- this Judge Wang, nine months --</p> <p>22 she made it go nine months where I spent money on</p> <p>23 discovery and going to trial and all this stuff.</p> <p>24 Instead, we had put in for a dismissal, and she didn't</p> <p>25 rule on that. She decided to sit back.</p>	<p style="text-align: right;">Page 179</p> <p>1 A. Are you a private company? You work for our</p> <p>2 government.</p> <p>3 Q. -- accusing people of making false --</p> <p>4 A. You're a government company.</p> <p>5 Q. I'm going to ask you not to interrupt me, sir.</p> <p>6 A. Yeah.</p> <p>7 Q. Do you think private companies or private</p> <p>8 citizens have a right in this country to file a lawsuit</p> <p>9 for -- against people making false and defamatory</p> <p>10 statements about them?</p> <p>11 A. That -- I will say that if it's -- if it's the</p> <p>12 right situation, but if the statements are true, they</p> <p>13 should be able to have dismissals, and that's what</p> <p>14 dismissals are for.</p> <p>15 And also -- and you're not a private</p> <p>16 company, if you're referring to yourself. Smartmatic is</p> <p>17 working for the government. These are -- we pay for</p> <p>18 these machines. I do as a taxpayer. You are a</p> <p>19 government entity as far as I'm concerned. I have every</p> <p>20 right to question you. I have every right to talk to</p> <p>21 the public about it, and you do not have the right to do</p> <p>22 lawfare against our citizens. You should have opened up</p> <p>23 your machines and said nothing to hide here, but you</p> <p>24 can't. You can't.</p> <p>25 Q. Mr. Lindell, have you ever lived in Los Angeles</p>
<p style="text-align: right;">Page 178</p> <p>1 Well, if I didn't have the resources, some</p> <p>2 little guy is going to be ran out of money, and that's</p> <p>3 not our justice system. And I called her out on it, and</p> <p>4 she made a ruling. At least rule for me or against me,</p> <p>5 but make a ruling. Don't sit back like a judge, like a</p> <p>6 coward, and go I'm not going to make a ruling or what</p> <p>7 their -- her agenda was. I don't know.</p> <p>8 Q. Mr. Lindell --</p> <p>9 A. But this is lawfare. What you guys do, you</p> <p>10 attack businesses. Instead of opening up your machines</p> <p>11 and saying nothing to hide here.</p> <p>12 Now I have everything. Now over the three</p> <p>13 years you've attacked me, we got cast vote records on</p> <p>14 Smartmatic. We have every evidence known to man on</p> <p>15 Smartmatic. You guys should just walk away and say</p> <p>16 sorry.</p> <p>17 Q. Mr. Lindell, let me ask you this: Do you think</p> <p>18 private companies or citizens have a right to file a</p> <p>19 lawsuit accusing people of making false and defamatory</p> <p>20 statements about them?</p> <p>21 A. What are you -- what are you talking about? Do</p> <p>22 I know...</p> <p>23 Q. Do you think private companies or private</p> <p>24 citizens have a right to file a lawsuit in this</p> <p>25 country --</p>	<p style="text-align: right;">Page 180</p> <p>1 County, California?</p> <p>2 A. I've been there many, many, many times.</p> <p>3 Q. Have you lived there, sir?</p> <p>4 A. I have not lived there.</p> <p>5 Q. Are you a taxpayer in Los Angeles County,</p> <p>6 California?</p> <p>7 A. No.</p> <p>8 Q. Okay. Let me ask you --</p> <p>9 A. Did I pay money in LA County? Yes.</p> <p>10 Q. Let me ask you this: In both of the shows that</p> <p>11 we watched from the War Room, the one on February 5th</p> <p>12 and then the couple of clips from February 6th, do you</p> <p>13 recall that you and Mr. Bannon talked about you</p> <p>14 receiving letters from Dominion?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. By February 5th, 2021, had you received</p> <p>17 a number of letters from Dominion's lawyers relating to</p> <p>18 statements that you were making about Dominion in the</p> <p>19 public?</p> <p>20 A. No. I had -- I believe I had one letter that</p> <p>21 came in December or Jan -- February -- January. It was</p> <p>22 the same form letter. A whole mass of people got --</p> <p>23 from poll watchers and everything. It was almost like a</p> <p>24 form letter.</p> <p>25 And then the other letter I got, I believe</p>

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<p style="text-align: right;">Page 181</p> <p>1 it was before "Absolute Proof," and that said anything</p> <p>2 you put in this or -- it could have came after. It</p> <p>3 listed all the people, Sidney Powell, Rudy Giuliani. It</p> <p>4 listed people, that these guys are not -- these are not</p> <p>5 true what they said. Not one of the people they listed</p> <p>6 on that letter was in my documentary.</p> <p>7 Q. Now, after "Absolute Proof," you filed a</p> <p>8 lawsuit against Smartmatic, correct?</p> <p>9 A. I don't know when it was. I don't -- the</p> <p>10 lawyers did that. To be honest with you, I was too busy</p> <p>11 doing my own things trying to -- 18 hours a day trying</p> <p>12 to get the word out about these machines.</p> <p>13 Q. You are aware, though, that claims were made</p> <p>14 against Smartmatic in a federal lawsuit by you?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. There was all these lawyers. I wasn't even</p> <p>18 involved in the decision on that, to be honest with you.</p> <p>19 Q. Now, are you aware that a federal court</p> <p>20 dismissed those claims that you brought against</p> <p>21 Smartmatic, sir?</p> <p>22 A. Yes. And that was done on the second day of</p> <p>23 the Cyber Symposium. What a -- what timing. Whoa,</p> <p>24 that's weird.</p> <p>25 Q. Mr. Lindell, are you accusing the federal judge</p>	<p style="text-align: right;">Page 183</p> <p>1 MR. KACHOUROFF: Is there an exhibit</p> <p>2 number, Nicole?</p> <p>3 MS. WRIGLEY: 600.</p> <p>4 MR. KACHOUROFF: Sorry.</p> <p>5 A. Did you guys sue OAN?</p> <p>6 Q. (BY MS. WRIGLEY) Mr. Lindell, do you see with</p> <p>7 respect to this disclaimer it states, "Michael James</p> <p>8 Lindell has purchased the airtime for the broadcast of</p> <p>9 its program on One America News Network. Mr. Lindell is</p> <p>10 the sole author and executive producer of this program</p> <p>11 and is solely and exclusively responsible for its</p> <p>12 content. The topic of this broadcast is the 2020</p> <p>13 election. OAN has undertaken its own reporting on this</p> <p>14 topic. This program is not the product of OAN's</p> <p>15 reporting. The views, opinions and claims expressed in</p> <p>16 this program by Mr. Lindell and other guests,</p> <p>17 presenters, producers or advertisers are theirs and</p> <p>18 theirs alone and are not adopted or endorsed by OAN or</p> <p>19 its owners. In particular, OAN does not adopt or</p> <p>20 endorse any statements or opinions in this program</p> <p>21 regarding the following entities or people: US</p> <p>22 Dominion, Inc. and any related entities, Smartmatic USA</p> <p>23 Corp., Brian Kemp, Brad Raffensperger or Gabriel</p> <p>24 Sterling. Further, the statements and claims expressed</p> <p>25 in this program are presented at this time as opinions</p>
<p style="text-align: right;">Page 182</p> <p>1 in that case of doing something suspicious?</p> <p>2 A. It's very suspicious.</p> <p>3 Q. You're -- you are accusing Judge Nichols in</p> <p>4 the --</p> <p>5 (Crosstalk.)</p> <p>6 A. It's very suspicious. The timing was very</p> <p>7 suspicious, yeah.</p> <p>8 Q. (BY MS. WRIGLEY) Okay.</p> <p>9 A. I answered your question.</p> <p>10 Q. Are you aware that the federal court in that</p> <p>11 case where you brought claims against Smartmatic also</p> <p>12 found that some of the claims you filed against</p> <p>13 Smartmatic were frivolous?</p> <p>14 A. That's his opinion.</p> <p>15 Q. Okay. Now, in those appearances, do you</p> <p>16 recall -- with Mr. Bannon, do you recall discussing a</p> <p>17 disclaimer that OAN put up in connection with "Absolute</p> <p>18 Proof"?</p> <p>19 A. Yes. As I found out about it, yeah.</p> <p>20 Q. Okay. I'm going to hand you an Exhibit 600,</p> <p>21 Mr. Lindell.</p> <p>22 (Exhibit 600 marked.)</p> <p>23 Q. (BY MS. WRIGLEY) And I'll represent this is a</p> <p>24 screenshot of that disclaimer that was put up relating</p> <p>25 to "Absolute Proof."</p>	<p style="text-align: right;">Page 184</p> <p>1 only and are not intended to be taken or interpreted by</p> <p>2 the viewer as established facts. The results in the</p> <p>3 2020 presidential election remain disputed and</p> <p>4 questioned by millions of Americans who are entitled to</p> <p>5 hear from all sides in order to help determine what may</p> <p>6 have happened."</p> <p>7 Do you see that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. And were you aware that OAN put up this</p> <p>10 disclaimer when it aired "Absolute Proof"?</p> <p>11 A. I believe it was after you sued FOX on</p> <p>12 February 4th that they let me know that they were going</p> <p>13 to put this on there.</p> <p>14 Q. And then prior to your other documentaries, you</p> <p>15 had read this disclaimer, correct, sir?</p> <p>16 A. For -- for OAN. OAN didn't have any other</p> <p>17 ones.</p> <p>18 Q. Okay. How much did you pay OAN to air</p> <p>19 "Absolute Proof" on its network?</p> <p>20 A. I have no idea.</p> <p>21 Q. Do you have records that would show how much</p> <p>22 OAN was paid to air "Absolute Proof"?</p> <p>23 A. I have no idea.</p> <p>24 Q. Did you pay that from your own personal</p> <p>25 finances or did OAN get paid by MyPillow or any other</p>

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<p style="text-align: right;">Page 185</p> <p>1 company?</p> <p>2 A. No. No. OAN, their ads would be MyPillow. If</p> <p>3 this was on the -- anything -- anything to do with the</p> <p>4 election stuff came right out of Mike Lindell's pocket.</p> <p>5 Q. Okay. So you, Mike Lindell, paid for OAN to</p> <p>6 broadcast the "Absolute Proof" documentary on its</p> <p>7 network?</p> <p>8 A. That would be -- that would be correct.</p> <p>9 Q. Okay. Okay. Now, after taping "Absolute</p> <p>10 Proof," you continued to promote the documentary with</p> <p>11 media?</p> <p>12 A. I could promote it anywhere.</p> <p>13 Q. You promoted it with Steve Bannon on War Room</p> <p>14 podcasts, correct?</p> <p>15 A. That would be a place -- the only place I could</p> <p>16 talk, because you guys put the kibosh on that.</p> <p>17 Q. Okay. All right, sir. Let's look at -- I'm</p> <p>18 going to mark another video, and we'll look at another</p> <p>19 one. This has been previously marked as DEF</p> <p>20 Exhibit 435.</p> <p>21 And for the record, this is a February 8,</p> <p>22 2021 video from Real America with Dan Ball, who appears</p> <p>23 on the OAN network.</p> <p>24 Do you know who Dan Ball is, Mr. Lindell?</p> <p>25 A. I met him once.</p>	<p style="text-align: right;">Page 187</p> <p>1 proves there was voter fraud and election fraud.</p> <p>2 Whether you believe it or not, and we know</p> <p>3 what the Left's going to say, oh, you're inciting</p> <p>4 violence by even saying the phrase. No, I think in</p> <p>5 America, you still have free speech.</p> <p>6 So anybody to the Left that says that OAN</p> <p>7 shouldn't be airing this or that we shouldn't even use</p> <p>8 the phrase or term "election fraud," sorry. It's called</p> <p>9 free speech.</p> <p>10 So joining me now is CEO of MyPillow, Mike</p> <p>11 Lindell, to wrap our show up today. Mike, we're going</p> <p>12 to be airing this "Absolute Proof" two-hour documentary.</p> <p>13 It just aired before this program, and it's going to air</p> <p>14 all weekend long.</p> <p>15 You paid for this. These aren't the views</p> <p>16 we're expressing on this network, but my opinion is, my</p> <p>17 personal ones, Dan Ball, the host, because I can an</p> <p>18 opinion, it's called free speech, is that yeah, there</p> <p>19 was election and voter fraud.</p> <p>20 The major networks even said there was,</p> <p>21 they just said not enough to overturn it. But that's</p> <p>22 the question. We don't know if there's enough because</p> <p>23 they've never let us investigate and see the servers and</p> <p>24 see the machines and see the ballots and the envelopes.</p> <p>25 So tell folks if they didn't view it yet what they're</p>
<p style="text-align: right;">Page 186</p> <p>1 Q. Have you appeared on his Real America show?</p> <p>2 A. I guess. If you show me, then I have.</p> <p>3 Q. Do you recall as you sit here right now,</p> <p>4 Mr. Lindell?</p> <p>5 A. What's that?</p> <p>6 Q. Do you recall if you've appeared on his show?</p> <p>7 A. I know the name. I don't know. We'll have to</p> <p>8 see if I'm on there.</p> <p>9 Q. Okay. I'm going to play Exhibit 435 now. This</p> <p>10 one's about seven minutes, so everybody knows.</p> <p>11 (Clip of Dan Ball and Mike Lindell.)</p> <p>12 DAN BALL: Welcome back. Time now to Get</p> <p>13 Real. It's a Friday. Once again, we're going to jingle</p> <p>14 things up. I invited somebody on to help me out, and in</p> <p>15 this Get Real, we're going to get real about the term</p> <p>16 "election fraud," because if you say it now, the</p> <p>17 election's over, people attack you. Twitter, Facebook,</p> <p>18 Instagram bans you. Your friends, your -- maybe your</p> <p>19 friends, strangers, who knows, co-workers will dock you,</p> <p>20 right? You can't say the phrase.</p> <p>21 So if you've been watching OAN, and right</p> <p>22 before this program, you saw a special documentary that</p> <p>23 was produced by the CEO of MyPillow, Mike Lindell. He</p> <p>24 put a lot of money, put lots of time into this. He went</p> <p>25 around the nation collecting evidence that he believes</p>	<p style="text-align: right;">Page 188</p> <p>1 going to see in this two-hour documentary that you</p> <p>2 produced.</p> <p>3 MR. LINDELL: What they're going to see is</p> <p>4 something they've never heard before and never seen, and</p> <p>5 that's cyber forensics footprints. They're going to</p> <p>6 have -- they're going to see in there what -- which</p> <p>7 country it came from, the ID of the computer, the IP</p> <p>8 address where it came over here. They have IP address</p> <p>9 in their computer it broke into here, the actual ID</p> <p>10 number of the computer, and then how many votes were</p> <p>11 flipped, whether they got Internet.</p> <p>12 It's a cyber footprint. It's what the</p> <p>13 government uses when they -- if you did an</p> <p>14 investigation, this is what you'd be looking for for</p> <p>15 that time.</p> <p>16 We have them from November 1st all the way</p> <p>17 through the election. It shows the -- a massive attack</p> <p>18 on our country by China and other countries. China did</p> <p>19 60 percent of this.</p> <p>20 It was all done through Dominion machines</p> <p>21 and Smartmatic machines. That was the tool they used.</p> <p>22 And you know, you said it before there right at the top</p> <p>23 of the show here. Since I've launched this today,</p> <p>24 YouTube took it down, Vimeo took it down. Google put</p> <p>25 out this story, this -- this Hogg story about inventing</p>

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<p style="text-align: right;">Page 189</p> <p>1 a pillow or something, we're coming up with a bill to</p> <p>2 suppress all the -- if you search my lindellrecover --</p> <p>3 or michaeljlindell.com where we put up the site, what</p> <p>4 they do is they push that down so you don't see it --</p> <p>5 DAN BALL: Uh-huh.</p> <p>6 MR. LINDELL: -- but I just bought their</p> <p>7 add- -- I just bought their address. I mean, we're</p> <p>8 putting new stuff up. You can't suppress it.</p> <p>9 Ten million people so far have watched this</p> <p>10 documentary around the world. They're telling me over</p> <p>11 in Australia and stuff, they're even trying to take it</p> <p>12 down there. What? That's kind of strange, huh?</p> <p>13 DAN BALL: Yeah.</p> <p>14 MR. LINDELL: You know, but you -- you</p> <p>15 watch this and you will -- by the -- you watch this, you</p> <p>16 will see -- you'll see the experts that were there, the</p> <p>17 government insiders that were there, generals, colonels.</p> <p>18 These guys are all there.</p> <p>19 These were -- this evidence came out very</p> <p>20 late. I came -- I got a -- I just got it January 9th.</p> <p>21 You know, January 9th. That's why they're going, well,</p> <p>22 why did this come out late? Because we all know the</p> <p>23 election was stole, it's just that they kept this down.</p> <p>24 And boy, you mention a machine, it's like,</p> <p>25 what? And I've told Dominion, sue me, you know. Now</p>	<p style="text-align: right;">Page 191</p> <p>1 DAN BALL: Yeah.</p> <p>2 MR. LINDELL: Just go watch the -- watch it</p> <p>3 on your show, watch it on OAN.</p> <p>4 DAN BALL: So Mike, all we could do -- and</p> <p>5 we read a promo today just saying it was going to be on</p> <p>6 our air, and they -- they suspended our Twitter account</p> <p>7 for 12 hours. I think it's back up now. But it was</p> <p>8 down for 12 hours just because we put an ad saying that</p> <p>9 you bought time, you're running this documentary, it's</p> <p>10 all you, and we put it on Twitter and bang, we got</p> <p>11 suspended, and they said because it could incite</p> <p>12 violence. That was their excuse, it could incite</p> <p>13 violence.</p> <p>14 MR. LINDELL: Incite violence.</p> <p>15 DAN BALL: I've got to end with this. You</p> <p>16 briefly touched on it right here. David Hogg. I'm not</p> <p>17 going to say anything about this young man that is</p> <p>18 negative because he was at the school when the shooting</p> <p>19 happened in Parkland, but he has become a big activist,</p> <p>20 a big antigun guy, there's a picture of him, and you</p> <p>21 just mentioned it. He now all of the sudden yesterday</p> <p>22 said he's going to start a pillow company to combat your</p> <p>23 pillow company.</p> <p>24 MR. LINDELL: No. No. Guys, no. Don't</p> <p>25 even give him air time. That's not him. They're doing</p>
<p style="text-align: right;">Page 190</p> <p>1 it's too late. Everybody knows about it now, so --</p> <p>2 DAN BALL: Well, yeah, they just sued FOX</p> <p>3 for -- FOX and some of their hosts, like that do what I</p> <p>4 do, talks shows, for 2.7 billion yesterday, coming out</p> <p>5 of Smartmatic, right, and Dominion because they're</p> <p>6 pissed off?</p> <p>7 MR. LINDELL: No. No. No. No. That's</p> <p>8 fake. What -- that's fake. I guarantee you they didn't</p> <p>9 sue them. That's all smoke and mirrors. That's to</p> <p>10 scare other people not to talk about Dominion and</p> <p>11 Smartmatic.</p> <p>12 DAN BALL: Uh-huh.</p> <p>13 MR. LINDELL: Did you see the lawsuit? Did</p> <p>14 anybody see it? You know, everybody that I could --</p> <p>15 Dominion hasn't sued me. They go, oh, Mike, they're</p> <p>16 suing you. No, they don't.</p> <p>17 Yesterday, Dominion, they sent me a letter,</p> <p>18 and they said, now, if you're going to have these people</p> <p>19 in your documentary, these have all been discredited.</p> <p>20 Not one person is in my documentary that was on that</p> <p>21 list.</p> <p>22 So anybody out there, this is real</p> <p>23 evidence, 100 percent proof. I wouldn't be doing all</p> <p>24 this if I -- if I thought it wasn't a hundred percent.</p> <p>25 It's a hundred percent.</p>	<p style="text-align: right;">Page 192</p> <p>1 this to suppress the truth of --</p> <p>2 DAN BALL: Right. Right.</p> <p>3 MR. LINDELL: -- all of the elections.</p> <p>4 DAN BALL: That's what I want you to get</p> <p>5 out there, that it's fake.</p> <p>6 MR. LINDELL: What they're doing is fake.</p> <p>7 He's not doing that. I'm not even giving it time. I</p> <p>8 haven't even responded. Nobody should. It's fake.</p> <p>9 He's -- that's just so they push down the big story is,</p> <p>10 guess what, 100 percent, we have the election fraud.</p> <p>11 Watch my -- watch my video, the -- watch my</p> <p>12 documentary, and you too will go, what? And what are --</p> <p>13 what are people going to do about it? Because this</p> <p>14 is -- you -- there's no statute of limitations on</p> <p>15 something about a crime against humanity. That's what</p> <p>16 this was. The whole world is watching.</p> <p>17 DAN BALL: Yep. All right. It is</p> <p>18 "Absolute Proof." It's going to air several times on</p> <p>19 the OAN network. Again, Mike Lindell produced it,</p> <p>20 solely, put it out there.</p> <p>21 And like I said, Mike, the reason I invited</p> <p>22 you on, I'm not going to read some statement like</p> <p>23 NewsMax did or get up and walk off because I don't agree</p> <p>24 with you, because that's a bunch of crap. If you can't</p> <p>25 stand the heat, get out of the kitchen, Mr. Sellers.</p>

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<p style="text-align: right;">Page 193</p> <p>1 I commend you for pushing forward and --</p> <p>2 with your right to free speech. So I want to watch this</p> <p>3 weekend, and we'll chat next week as well.</p> <p>4 Mike, you take care. Have a good weekend.</p> <p>5 Okay?</p> <p>6 MR. LINDELL: Yeah. Thank you. Thanks,</p> <p>7 guys. God bless. Thanks.</p> <p>8 DAN BALL: All right. And there you go.</p> <p>9 Let's keep it real and get real, right? Get real.</p> <p>10 There was voter election fraud. How much?</p> <p>11 Was it enough to change the election? Watch the</p> <p>12 documentary. You decide. That's what we're about here</p> <p>13 at OAN, free speech and free thought, unlike those other</p> <p>14 mainstream media corporate lap dogs.</p> <p>15 You have a great weekend. Relax, take it</p> <p>16 easy. We're back here Monday. See you at 5:00 p.m.,</p> <p>17 8:00 p.m. Pacific. Until then, folks, remember: Be</p> <p>18 proud, be safe, and God bless.</p> <p>19 (Clip ends.)</p> <p>20 Q. (BY MS. WRIGLEY) Mr. Lindell, do you recall</p> <p>21 doing that appearance with Dan Ball on Real America on</p> <p>22 the OAN network talking about Absolute Proof?</p> <p>23 A. Yeah. And I believe that was February 5th.</p> <p>24 You said 8th before. It wasn't the 5th [sic], it was</p> <p>25 the 5th.</p>	<p style="text-align: right;">Page 195</p> <p>1 someone that would be subjective. He's not a machine</p> <p>2 guy, as he says. So --</p> <p>3 Q. Okay.</p> <p>4 A. -- he was like -- I think I was the host and he</p> <p>5 was like -- he would comment and give me all the hard</p> <p>6 questions.</p> <p>7 Q. And in connection with that screening with</p> <p>8 Mr. Bannon, did you specifically mention the -- that the</p> <p>9 Smartmatic machines were part of an attack on the</p> <p>10 country in connection with the 2020 election?</p> <p>11 A. I have no idea. No idea.</p> <p>12 Q. Okay. Did you mention that Smartmatic is lying</p> <p>13 about its machines not being connected to the Internet?</p> <p>14 A. That their machines are all connected, a</p> <p>15 hundred percent, I said that to all machines.</p> <p>16 Q. Okay.</p> <p>17 A. I've said that a million times, because they</p> <p>18 are.</p> <p>19 Q. Okay. And what's your basis for saying that,</p> <p>20 Mr. Lindell?</p> <p>21 A. What's my basis?</p> <p>22 Q. Yes.</p> <p>23 A. I have devices that show they're all on the</p> <p>24 Internet and see --</p> <p>25 Q. You have devices from Smartmatic, sir?</p>
<p style="text-align: right;">Page 194</p> <p>1 Q. The 5th of February.</p> <p>2 A. Not the 8th. Yeah.</p> <p>3 Q. So around the same day that you --</p> <p>4 A. Yeah.</p> <p>5 Q. -- put out Absolute Proof?</p> <p>6 A. Yeah, the same day. Yeah.</p> <p>7 Q. Okay. And in that appearance with Dan Ball on</p> <p>8 the Real America show, you specifically mentioned that</p> <p>9 the election fraud was done through the Smartmatic</p> <p>10 machines, correct?</p> <p>11 A. Yeah. They were added in there, yep.</p> <p>12 Q. And you indicated that you had a hundred</p> <p>13 percent proof of that, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. Okay. And you also indicated that the</p> <p>16 "Absolute Proof" documentary had been seen by 10 million</p> <p>17 people around the world, correct?</p> <p>18 A. Yeah.</p> <p>19 Q. Now, did you do a discussion or a screening</p> <p>20 with Steve Bannon about "Absolute Proof" in addition to</p> <p>21 the War Room podcast appearances?</p> <p>22 A. What do you mean?</p> <p>23 Q. Did you introduce a screening of "Absolute</p> <p>24 Proof" with Mr. Bannon on OAN?</p> <p>25 A. Yeah. He was -- he -- he was -- we wanted</p>	<p style="text-align: right;">Page 196</p> <p>1 A. Well, no. We can -- we can be in the same room</p> <p>2 as Smartmatic -- and I have -- and we have the cast vote</p> <p>3 records now from LA County, the cast vote records from</p> <p>4 both 2020 and the 2022 election. I paid thousands of</p> <p>5 dollars for them to get them right from the city, and I</p> <p>6 got them from them.</p> <p>7 It shows one hundred percent computer</p> <p>8 manipulation. It actually matches, incidentally, with</p> <p>9 Mesa County's image from Colorado, and -- which was</p> <p>10 Dominion. They're identical. The algorithm stuff, it's</p> <p>11 not -- there's no in between. You either have computer</p> <p>12 manipulation online or you don't. There's no in</p> <p>13 between. You don't have partial. And Smartmatic,</p> <p>14 hundred percent guilty.</p> <p>15 Q. Mr. Lindell, are you a computer expert?</p> <p>16 A. Huh?</p> <p>17 Q. Are you a computer expert?</p> <p>18 A. No, but I'm a numbers expert --</p> <p>19 Q. Right.</p> <p>20 A. -- at deviations, beyond anybody you've ever</p> <p>21 met, if you really want to know the truth.</p> <p>22 Q. Do you know how to read source code?</p> <p>23 A. Do I know source code? No, but I hire guys</p> <p>24 that are really good --</p> <p>25 Q. Okay.</p>

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<p style="text-align: right;">Page 197</p> <p>1 A. -- the best in the world that have worked for</p> <p>2 our government for years.</p> <p>3 Q. Okay. Who are those guys, sir?</p> <p>4 MR. KACHOUROFF: Okay. Hold on. I'm going</p> <p>5 to object. If you start doing this staccato back and</p> <p>6 forth that quickly, she's going to get --</p> <p>7 THE WITNESS: Right.</p> <p>8 MR. KACHOUROFF: -- irritated again.</p> <p>9 So I -- Nicole, I need you to slow down as</p> <p>10 well.</p> <p>11 MS. WRIGLEY: Sure.</p> <p>12 Q. (BY MS. WRIGLEY) Who are the guys that you</p> <p>13 hired, sir?</p> <p>14 A. I could list off so many of them. Well, we --</p> <p>15 I've talked to generals and colonels. I told you that.</p> <p>16 I've hired Conan Hayes, Sean Smith. But he's not paid,</p> <p>17 but he's a -- he was a Colonel who worked with cyber</p> <p>18 with the government. Oh, let's see. Yeah, Clay Parikh.</p> <p>19 Walter Daugherty.</p> <p>20 The list goes on. I could name 50 of them.</p> <p>21 Ben -- Ben Cotton. These guys all worked for the</p> <p>22 government. Another guy hired in Texas here, he worked</p> <p>23 for the government. He validated the machines. This</p> <p>24 guy is a -- the government stamps him. He's the one</p> <p>25 that stamps them, that stamps them.</p>	<p style="text-align: right;">Page 199</p> <p>1 A. What's that?</p> <p>2 Q. Have you looked at the LA machines yourself,</p> <p>3 sir?</p> <p>4 A. No. My people did. They --</p> <p>5 Q. Okay. And --</p> <p>6 A. All of my people did.</p> <p>7 Q. Please identify the specific names of every</p> <p>8 individual that you understand has looked at machines</p> <p>9 from LA County for the election in 2020.</p> <p>10 A. Jeff O'Donnell.</p> <p>11 Q. Okay.</p> <p>12 A. I believe Walter Daugherty, Clay Parikh, Ben</p> <p>13 Cotton, Conan Hayes, Todd Sanders. I could keep naming</p> <p>14 them. I...</p> <p>15 Q. Okay. And did any of those individuals have</p> <p>16 access to the source code for the LA County VSAP voting</p> <p>17 machines that were used in the 2020 election, sir?</p> <p>18 A. I believe, yes.</p> <p>19 Q. And how did they get that access?</p> <p>20 A. I don't know. I don't know. But they do have</p> <p>21 the cast vote records, which is under the Freedom of</p> <p>22 Information Act. That's where I -- we -- we got it all.</p> <p>23 We got it all from there.</p> <p>24 Q. And do you have records of specific voters and</p> <p>25 how they voted for in the 2020 election?</p>
<p style="text-align: right;">Page 198</p> <p>1 Q. Any other names, sir?</p> <p>2 A. I forget his name.</p> <p>3 Q. Just their names.</p> <p>4 A. No. Yeah, I don't know his name, but I could</p> <p>5 name -- if I -- I just named some of them. There's at</p> <p>6 least 30 that I've either hired directly or they did it</p> <p>7 on their own and said here, this is -- Jeff O'Donnell's</p> <p>8 another one.</p> <p>9 Dennis Montgomery, he worked for the</p> <p>10 government for 15, 20 years for the CIA. These are --</p> <p>11 guys are the best cyber guys in the world. They're</p> <p>12 White Hat hackers that have to block us from cyber</p> <p>13 attacks, and they've all --</p> <p>14 Q. So --</p> <p>15 A. -- either worked for the government or they</p> <p>16 worked with Hammer Scorecard, like General McInerney.</p> <p>17 When you guys finally depose him, he was right there.</p> <p>18 He's got -- you know, hearing it from a general? You're</p> <p>19 going, okay, I kind of believe my generals, so...</p> <p>20 Q. Mr. Lindell, can I --</p> <p>21 A. But, yeah, and there's other ones too that</p> <p>22 we've --</p> <p>23 Q. I want to ask you about these -- this --</p> <p>24 machines in LA County that you looked at. Have you</p> <p>25 looked at them yourself, sir?</p>	<p style="text-align: right;">Page 200</p> <p>1 A. You can't -- you can't get that. Cast vote</p> <p>2 records don't show that --</p> <p>3 Q. Okay.</p> <p>4 A. -- machine analogy.</p> <p>5 Q. That's private information, sir, right?</p> <p>6 A. Yeah. Yeah. Yeah. You --</p> <p>7 Q. Okay.</p> <p>8 A. Yeah, you're very subtle.</p> <p>9 THE COURT REPORTER: Okay. I didn't get</p> <p>10 any of that because --</p> <p>11 THE WITNESS: She's being sarcastic.</p> <p>12 MR. KACHOUROFF: Stop. Stop, Mike.</p> <p>13 THE WITNESS: She's trying to be funny.</p> <p>14 MR. KACHOUROFF: Hey, hey, hey. Wait,</p> <p>15 wait. Both of you are causing this.</p> <p>16 THE WITNESS: Yeah.</p> <p>17 MR. KACHOUROFF: You just need to slow</p> <p>18 down, let him finish. I know he's long-winded, but</p> <p>19 you're asking open-ended questions.</p> <p>20 MS. WRIGLEY: Okay.</p> <p>21 THE WITNESS: She was trying to be funny.</p> <p>22 I caught her.</p> <p>23 MR. KACHOUROFF: Okay.</p> <p>24 Q. (BY MS. WRIGLEY) Okay. Sir, I've got --</p> <p>25 A. Can I say one more thing there?</p>

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<p style="text-align: right;">Page 201</p> <p>1 Q. Go ahead.</p> <p>2 A. A cast vote record is the one thing we can get</p> <p>3 under the Freedom of Information Act, and I got</p> <p>4 one-third of the United States before they deleted stuff</p> <p>5 on September 3rd of 2022.</p> <p>6 I reached out to every county. But LA</p> <p>7 County, I really wanted bad because that was your only</p> <p>8 county, and we got that for both 2020 and 2022, and it</p> <p>9 was the biggest deep dive you've ever seen. And we also</p> <p>10 have China tied into that, too, so --</p> <p>11 Q. Okay. Okay, sir.</p> <p>12 A. -- it's very...</p> <p>13 MS. WRIGLEY: I'm just going to move to</p> <p>14 strike as nonresponsive.</p> <p>15 THE WITNESS: Yeah.</p> <p>16 Q. (BY MS. WRIGLEY) I'm going to show you a</p> <p>17 couple more clips related to "Absolute Proof" playing on</p> <p>18 OAN. These are clips from what I believe is</p> <p>19 February 11th where you appeared with Steve Bannon</p> <p>20 talking about a screening of "Absolute Proof."</p> <p>21 I've got two clips. One of them is going</p> <p>22 to be marked as Exhibit 601.</p> <p>23 (Exhibit 601 marked.)</p> <p>24 Q. (BY MS. WRIGLEY) I'm going to have my</p> <p>25 colleague play 601. And then Julie -- after it's over,</p>	<p style="text-align: right;">Page 203</p> <p>1 A. No, I know.</p> <p>2 Q. -- and testifying with anyone. Particularly, I</p> <p>3 don't know who you're texting with or communicating,</p> <p>4 but if --</p> <p>5 (Crosstalk.)</p> <p>6 A. It's my company you've tried to destroy, so</p> <p>7 it's okay.</p> <p>8 Q. (BY MS. WRIGLEY) Okay. But if you need to</p> <p>9 take a break at any point in time, we can take a break,</p> <p>10 but I can't have you communicating --</p> <p>11 A. Okay.</p> <p>12 Q. -- with somebody outside of this room when</p> <p>13 we're on the record, sir.</p> <p>14 A. Yeah.</p> <p>15 Q. Do you understand?</p> <p>16 A. Yeah, I got it.</p> <p>17 Q. Okay. You didn't -- I'm sorry. You didn't</p> <p>18 look at me, and I just would ask for a little respect --</p> <p>19 A. Yeah, I got it.</p> <p>20 Q. -- a little bit of respect, okay? You</p> <p>21 understand?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. Were you able to watch the clip, sir?</p> <p>24 A. Yeah. Yeah, I see the clip.</p> <p>25 Q. Okay. I'm going to play a second clip. This</p>
<p style="text-align: right;">Page 202</p> <p>1 I'll have her play the second clip. It's from the same</p> <p>2 appearance, it's just a different clip. They're both a</p> <p>3 couple minutes. And that will be marked Exhibit 602.</p> <p>4 (Exhibit 602 marked.)</p> <p>5 (Clip of Steve Bannon and Mike Lindell.)</p> <p>6 STEVE BANNON: To start this film off, what</p> <p>7 people want to know, are you going to back down one</p> <p>8 inch --</p> <p>9 MR. LINDELL: Never. Absolutely never.</p> <p>10 This isn't about --</p> <p>11 Q. (BY MS. WRIGLEY) Mr. Lindell --</p> <p>12 (Clip continues.)</p> <p>13 MR. LINDELL: -- I don't care if you're a</p> <p>14 Democrat or Republican. This was an attack on our</p> <p>15 country. These Dominion machines and Smartmatic, these</p> <p>16 machines that were -- that are -- that were the -- that</p> <p>17 were the tools of this attack, and we will never have</p> <p>18 another fair election if we don't -- if we don't stop</p> <p>19 them. So I will never back down.</p> <p>20 (Clip ends.)</p> <p>21 Q. (BY MS. WRIGLEY) Okay. Before we play the</p> <p>22 second clip, Mr. Lindell, I would just ask during this</p> <p>23 deposition -- I know you were on your phone texting, but</p> <p>24 that's -- unfortunately for you, it's not allowed. I</p> <p>25 can't have you communicate while you're on the record --</p>	<p style="text-align: right;">Page 204</p> <p>1 is Exhibit 602.</p> <p>2 A. Okay.</p> <p>3 (Clip of Steve Bannon and Mike Lindell.)</p> <p>4 STEVE BANNON: What would you tell the</p> <p>5 audience? And then how are you going to back up these</p> <p>6 assertions by Colonel Waldron, the cyber warfare expert?</p> <p>7 MR. LINDELL: Well, I'll tell you, if</p> <p>8 you're caught cheating in a poker game, what do you do?</p> <p>9 Of course, you start lying. And they're all liars</p> <p>10 there. They're lying. They're boldface lying.</p> <p>11 I mean, the easier part about it not going</p> <p>12 online, if you're Dominion or Smartmatic, I mean, that's</p> <p>13 been proven ten times over. So if you lie a little bit,</p> <p>14 usually you're lying a lot. And this is all going to</p> <p>15 come out.</p> <p>16 When you asked me about that other guy,</p> <p>17 we -- you know, that remains to be seen. Is he -- does</p> <p>18 he really -- is he really that naive that he doesn't</p> <p>19 know what happened, or is he lying? And then you know</p> <p>20 what? What do you lie for? You usually lie to cover</p> <p>21 something up.</p> <p>22 You know, I went out here with everything I</p> <p>23 have, because I'm a hundred percent, 100 percent that we</p> <p>24 have all the proof. That's why it's called "Absolute</p> <p>25 Proof."</p>

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<p style="text-align: right;">Page 205</p> <p>1 (Clip ends.)</p> <p>2 Q. (BY MS. WRIGLEY) Okay. Mr. Lindell, I have</p> <p>3 one more clip. This is the third clip from the</p> <p>4 screening with Mr. Bannon.</p> <p>5 MS. WRIGLEY: Before I do that, that one</p> <p>6 will be marked --</p> <p>7 MS. LOFTUS: 603.</p> <p>8 MS. WRIGLEY: -- 603.</p> <p>9 (Exhibit 603 marked.)</p> <p>10 Q. (BY MS. WRIGLEY) Do you recognize you on that</p> <p>11 video, sir?</p> <p>12 A. (Witness indicated by nodding his head</p> <p>13 affirmatively.)</p> <p>14 Q. I'm sorry. You have to give an oral response.</p> <p>15 A. Yes. Yes. I recognize the tie.</p> <p>16 Q. One more -- one more clip, sir.</p> <p>17 A. I lost that one.</p> <p>18 MS. WRIGLEY: Go ahead.</p> <p>19 (Clip of Steve Bannon and Mike Lindell.)</p> <p>20 MR. LINDELL: And I -- my -- part of my due</p> <p>21 diligence -- that's been all this week. I -- I want to</p> <p>22 go back to where this all started in Venezuela. It all</p> <p>23 started in Venezuela with Smartmatic, not Dominion and</p> <p>24 the other one. It was with Smartmatic. And I have --</p> <p>25 we're going to have the gal -- all this gal -- I'll</p>	<p style="text-align: right;">Page 207</p> <p>1 Absolutely.</p> <p>2 Q. Okay. And you mentioned Smartmatic, along with</p> <p>3 Dominion, being boldface lying about its machines not --</p> <p>4 A. A hundred percent saying they're not on the</p> <p>5 Internet, yes.</p> <p>6 Q. Okay. And you mentioned that's been a lie on</p> <p>7 this appearance with Mr. Bannon, correct?</p> <p>8 A. And he's -- yeah, still lying.</p> <p>9 Q. And in this appearance promoting "Absolute</p> <p>10 Proof" with Mr. Bannon, you were tying Smartmatic to</p> <p>11 election fraud in connection with the 2020 election,</p> <p>12 right?</p> <p>13 A. Basically, what I said there, it all started in</p> <p>14 Venezuela with Smartmatic. By that time, I had also</p> <p>15 started a whole other investigation. That's what I</p> <p>16 teased there.</p> <p>17 Q. Yep. And you're -- you're -- specifically</p> <p>18 mentioned Venezuela in there, correct?</p> <p>19 A. Yep.</p> <p>20 Q. Okay. And in the months after you taped</p> <p>21 "Absolute Proof" in 2021, did you give additional media</p> <p>22 appearances in order to specifically talk about</p> <p>23 Smartmatic in connection with election fraud?</p> <p>24 A. Nobody would -- nobody would have me on because</p> <p>25 you guys scared them off.</p>
<p style="text-align: right;">Page 206</p> <p>1 put all -- that evidence, I will put up on my</p> <p>2 michaeljlindeLL.com website.</p> <p>3 (Clip ends.)</p> <p>4 Q. (BY MS. WRIGLEY) Okay. Do you recall doing</p> <p>5 appearances or discussions with Mr. Bannon at OAN in</p> <p>6 connection with "Absolute Proof" being screened on that</p> <p>7 network?</p> <p>8 A. Yeah --</p> <p>9 Q. Okay.</p> <p>10 A. -- from what I recall. It's three years ago,</p> <p>11 but yeah.</p> <p>12 Q. And you recognize that you're --</p> <p>13 A. Yeah. Yeah.</p> <p>14 Q. You recognize you're in those clips with</p> <p>15 Mr. Bannon?</p> <p>16 A. Yeah. Yeah.</p> <p>17 Q. And in those clips, you are specifically</p> <p>18 mentioning Smartmatic machines being part of an attack</p> <p>19 on the country in connection with the 2020 election,</p> <p>20 correct?</p> <p>21 A. It's right there. I talked about Venezuela,</p> <p>22 and we have a separate investigation on that, so...</p> <p>23 Q. Okay. But you -- you did mention Smartmatic in</p> <p>24 connection with the 2020 election?</p> <p>25 A. Yeah. Yeah. Yeah, I mentioned Smartmatic.</p>	<p style="text-align: right;">Page 208</p> <p>1 Q. Okay. Now, you had mentioned that in one of</p> <p>2 those clips that it all started in Venezuela with</p> <p>3 Smartmatic, correct?</p> <p>4 A. I said that we had evidence now that it did.</p> <p>5 We -- I hired a company, it was like, I don't know, a</p> <p>6 couple hundred thousand dollars, and they did a deep</p> <p>7 dive into the genesis of all of this, and Smartmatic --</p> <p>8 and there was also some -- there was also work that kind</p> <p>9 of validated what Sidney Powell had been putting out</p> <p>10 that I had heard.</p> <p>11 But I wanted to find my own due diligence,</p> <p>12 and we did our own, and it goes back to Venezuela. I</p> <p>13 actually talked to people in Venezuela. The underground</p> <p>14 there had them on crying and saying, you know, to -- and</p> <p>15 telling us what had happened in Venezuela with their</p> <p>16 country being taken over by the machines.</p> <p>17 Q. Are you aware that Smartmatic blew the whistle</p> <p>18 on the government of Venezuela years before the 2020</p> <p>19 election, sir?</p> <p>20 A. Was what?</p> <p>21 Q. Are you aware --</p> <p>22 MR. KACHOUROFF: Objection, assumes facts</p> <p>23 not in evidence.</p> <p>24 Q. (BY MS. WRIGLEY) Are you aware that Smartmatic</p> <p>25 blew the whistle on the government of Venezuela a number</p>

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<p style="text-align: right;">Page 209</p> <p>1 of years prior to 2020?</p> <p>2 A. I'm -- I don't know, but -- I'm not aware of</p> <p>3 that, but I'm sure you had a hidden agenda there, too.</p> <p>4 Q. And whenever you bring up or in the past when</p> <p>5 you've brought up Smartmatic in connection with</p> <p>6 Venezuela, are you mentioning Venezuela for any</p> <p>7 particular reason, sir?</p> <p>8 A. Because of many -- because there's about -- I</p> <p>9 don't know how many countries now have been taken by the</p> <p>10 voting machines, and the last one being Brazil, which is</p> <p>11 a good friend of mine, President Bolsonaro.</p> <p>12 Argentina, one judge made a ruling last</p> <p>13 year to get rid of the machines, and they had a fair and</p> <p>14 free election.</p> <p>15 I met a guy named Clint Curtis. He's a</p> <p>16 Democrat. He set the first algorithms in all your</p> <p>17 machines to steal elections. It's very public.</p> <p>18 The Netherlands said how do -- what do we</p> <p>19 do now that you put these in there?</p> <p>20 THE COURT REPORTER: Will you slow down,</p> <p>21 please.</p> <p>22 A. He said what did you do now that the</p> <p>23 Netherlands -- the Netherlands asked him, what do we do</p> <p>24 now that you set this way to cheat with these machines?</p> <p>25 And the Netherlands said -- he said there's</p>	<p style="text-align: right;">Page 211</p> <p>1 is from a Mona Bagsby --</p> <p>2 A. Uh-huh.</p> <p>3 Q. -- at Main Street Media?</p> <p>4 A. Right.</p> <p>5 Q. Do you know Main Street Media?</p> <p>6 A. Never heard of them.</p> <p>7 Q. Have you heard of Main Street Media Tennessee?</p> <p>8 A. Never heard of them.</p> <p>9 Q. So you see that Mona Bagsby E-mailed Dawn</p> <p>10 Curtis on February 17th, 2021?</p> <p>11 A. Right.</p> <p>12 Q. The subject was Main Street Media TN, Main</p> <p>13 Street Today with Devon O'Day Show. Do you see that?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. In that E-mail, Mona writes, "Hi, Don.</p> <p>16 I sure miss working with you. I would love to have</p> <p>17 Mr. Mike Lindell on our show."</p> <p>18 A. Right.</p> <p>19 Q. "I don't have his personal assistant's info.</p> <p>20 It was on my computer at WSM. Could you possibly put me</p> <p>21 in touch? I have him in my phone with his cell phone,</p> <p>22 but I respect his privacy and would rather go through</p> <p>23 the correct channels. If you could help me with that, I</p> <p>24 would really appreciate it." Do you see that?</p> <p>25 A. Yeah.</p>
<p style="text-align: right;">Page 210</p> <p>1 nothing you can do. In five months, the Netherlands</p> <p>2 switched over to paper ballots hand counted. His name</p> <p>3 is Clint Curtis. He's been very vocal. He's a</p> <p>4 Democrat. But the Republicans used it against him, and</p> <p>5 so he blew the whistle on them like in 2005, 2006.</p> <p>6 Q. (BY MS. WRIGLEY) Mr. Lindell, do you have a</p> <p>7 vendetta against Smartmatic?</p> <p>8 A. No. All machines, they got to go. We've got</p> <p>9 to save our country. I want the American dream. I have</p> <p>10 lived the American dream, from going from a crack addict</p> <p>11 to where I'm at now with all these employees and stuff,</p> <p>12 and that's all I want.</p> <p>13 I want the -- there's no vendetta. I want</p> <p>14 all computers gone in our elections, that's it. You</p> <p>15 could call it ES&S, Smartmatic, Hart, Diebold, it</p> <p>16 doesn't matter.</p> <p>17 Q. I'm going to hand -- I've handed to you what's</p> <p>18 been marked as Exhibit 604, sir.</p> <p>19 (Exhibit 604 marked.)</p> <p>20 Q. (BY MS. WRIGLEY) I'll represent you're not in</p> <p>21 this E-mail, but it is produced by the defendants, and</p> <p>22 it's from the MyPillow E-mail account. This is DEF</p> <p>23 026318.</p> <p>24 And I'll walk you through this document.</p> <p>25 Do you see at the bottom, the first E-mail in this chain</p>	<p style="text-align: right;">Page 212</p> <p>1 Q. And then do you see at the top that a response</p> <p>2 comes from Katelyn Gamlin?</p> <p>3 A. Uh-huh.</p> <p>4 Q. And she's your executive assistant?</p> <p>5 A. Yeah.</p> <p>6 Q. And in 2021, was Katelyn Gamlin scheduling</p> <p>7 media appearances for you, Mike Lindell?</p> <p>8 A. She was screening them.</p> <p>9 Q. I'm sorry. What?</p> <p>10 A. She screened this one, yes.</p> <p>11 Q. Okay. And she responded to Mona saying, "Thank</p> <p>12 you for the time to reach out. My name is Katelyn, and</p> <p>13 I'm Mike Lindell's scheduler. Unfortunately, at this</p> <p>14 time we are not scheduling any additional interviews</p> <p>15 unless the topic can be on Dominion and Smartmatic</p> <p>16 machines. If that is not a topic available for</p> <p>17 discussion, we are not able to accept at this time." Do</p> <p>18 you see that?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Do you know whether you did an appearance with</p> <p>21 Main Street Media in 2021?</p> <p>22 A. I don't know, but I will say this, the point</p> <p>23 was that was -- that goes right in with every media we</p> <p>24 went on, they're going, oh, you're getting cancelled,</p> <p>25 you're getting cancelled, but I couldn't tell them why.</p>

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<p style="text-align: right;">Page 213</p> <p>1 So I'm going to save time. If I can't bring up the</p> <p>2 machine companies and say here's why we're getting</p> <p>3 cancelled, we want paper ballots hand counted, if I</p> <p>4 couldn't do that, I'm not going to waste my time with</p> <p>5 this media, whoever this was in Tennessee.</p> <p>6 Q. Okay.</p> <p>7 A. That's what this is screening.</p> <p>8 Q. In 2021, were you not doing media appearances</p> <p>9 unless you could talk about Smartmatic?</p> <p>10 A. No, that's not true. I was doing all kinds of</p> <p>11 media appearance as -- they wanted me on -- Fox Sports</p> <p>12 cancelled you, Mike. This cancelled you. I would take</p> <p>13 anything I could, but I wanted to say why I was getting</p> <p>14 cancelled.</p> <p>15 Q. You wanted to identify --</p> <p>16 A. Because I wanted to get rid of the machine</p> <p>17 companies. Had nothing to do with Smartmatic or</p> <p>18 Dominion. You could include ES&S in there. You guys</p> <p>19 are just the biggest names out there because you sued</p> <p>20 everybody.</p> <p>21 MR. KACHOUROFF: Nicole, was that 604?</p> <p>22 MS. WRIGLEY: That was 604, yes. I'm about</p> <p>23 to mark 605.</p> <p>24 MR. KACHOUROFF: Okay.</p> <p>25 MS. WRIGLEY: And then maybe one more, and</p>	<p style="text-align: right;">Page 215</p> <p>1 A. Yeah.</p> <p>2 Q. And then if you go to first page, do you see</p> <p>3 that KG, Katelyn Gamlin, responds to Chris? It's at the</p> <p>4 very bottom. It's on February 19th. Do you see that,</p> <p>5 sir?</p> <p>6 A. Yes.</p> <p>7 Q. She writes, "Hello, Chris. Thanks for taking</p> <p>8 the time to reach out. Before I'm able to look into</p> <p>9 Mike's calendar, can you please provide a little more</p> <p>10 information on your show, such as your show's reach,</p> <p>11 guests you've had on, length of interview, open dates,</p> <p>12 times, if it's audio, video, all the topics you'd</p> <p>13 interested in and if the topic of Smartmatic or Dominion</p> <p>14 and Smartmatic machines are able to be discussed." Do</p> <p>15 you see that?</p> <p>16 A. Right.</p> <p>17 Q. And then do you see that there's a response by</p> <p>18 Chris?</p> <p>19 A. Yes.</p> <p>20 Q. And he says, "Hey KG. For starters, we very</p> <p>21 specifically want to talk about Dominion and Smartmatic.</p> <p>22 Nothing will be off the table. We just want to give</p> <p>23 Mike another platform." Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Do you recall whether or not you appeared on</p>
<p style="text-align: right;">Page 214</p> <p>1 we'll take a break for lunch.</p> <p>2 (Exhibit 605 marked.)</p> <p>3 Q. (BY MS. WRIGLEY) I'm going to hand to you</p> <p>4 Exhibit 605 --</p> <p>5 MR. KACHOUROFF: Thank you.</p> <p>6 Q. (BY MS. WRIGLEY) -- Bates stamped DEF 009706.</p> <p>7 Two pages. I'm going to start you at the back of this</p> <p>8 document because the E-mail -- the first E-mail in the</p> <p>9 chain is at the back. Can you go to the second page,</p> <p>10 sir?</p> <p>11 A. Yep.</p> <p>12 Q. Do you see that there's a -- in the middle,</p> <p>13 there's an E-mail on February 18th, 2021 from a</p> <p>14 chris@humorousmathematicians, and it's a Chris Deluge,</p> <p>15 cofounder and editor in chief?</p> <p>16 A. Uh-huh. Yes.</p> <p>17 Q. He writes, "Hello there. I would like to see</p> <p>18 if I can get some info. We're doing a podcast</p> <p>19 appearance by Mike Lindell. We have millions of</p> <p>20 followers on our website. I would love to give Mike an</p> <p>21 open platform with no censorship to discuss the election</p> <p>22 fraud evidence, as we see how much this truth is being</p> <p>23 censored. Please let me know whenever you can regarding</p> <p>24 what it would take to make something like this happen."</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 216</p> <p>1 this podcast?</p> <p>2 A. Absolutely no idea.</p> <p>3 Q. Okay. Do you recall appearing on podcasts and</p> <p>4 talking about Smartmatic and election fraud in February</p> <p>5 of 2021, sir?</p> <p>6 A. If I could get on anything I could get on and</p> <p>7 they would let me talk about why I was getting cancelled</p> <p>8 and to save our country to get rid of these machines,</p> <p>9 hundred percent.</p> <p>10 Q. Okay.</p> <p>11 A. But after February 5th, very few would have me</p> <p>12 on. That's why I had to create FrankSpeech.</p> <p>13 Q. In February of 2021, you wanted to get on --</p> <p>14 wanted to get in the news or be with media talking about</p> <p>15 Smartmatic machines, correct?</p> <p>16 A. No. I wanted to get on the news to get rid --</p> <p>17 to talk about their elections, to get rid of all machine</p> <p>18 companies. You just happen to be one of them.</p> <p>19 Q. Smartmatic does?</p> <p>20 A. Yeah, absolutely.</p> <p>21 Q. Okay. Now, in 2021, did you talk to any</p> <p>22 election officials about not using Smartmatic voting</p> <p>23 machines?</p> <p>24 A. Say that again.</p> <p>25 Q. In 2021, did you talk to any election officials</p>

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<p style="text-align: right;">Page 217</p> <p>1 about not using Smartmatic voting machines?</p> <p>2 A. What do you mean by that?</p> <p>3 Q. Did you talk to any election officials anywhere</p> <p>4 in the country and the world and said don't use</p> <p>5 Smartmatic voting machines?</p> <p>6 A. I think I was very vocal. You can't keep going</p> <p>7 to election officials. Which election officials was</p> <p>8 I -- was going to go to? Biden? I mean, I wasn't going</p> <p>9 to go into D.C., I'll tell you that, when he banned</p> <p>10 MyPillow from coming in there and bringing reserves that</p> <p>11 were laying in a garage on the ground with no pillows,</p> <p>12 our armed forces, and I couldn't bring a MyPillow truck</p> <p>13 in there because he wouldn't let me bring them free</p> <p>14 pillows.</p> <p>15 So no, I did not talk to our government</p> <p>16 officials at that time.</p> <p>17 Q. Have you ever talked to any election officials</p> <p>18 about not using Smartmatic voting machines, ever?</p> <p>19 A. Oh, about all voting machines. I don't bring</p> <p>20 up specific Smartmatic. I've included ES&S. Now that</p> <p>21 I've learned we have Hart, ES&S, all of these machines.</p> <p>22 It's one big blob. They're all together.</p> <p>23 Q. Okay.</p> <p>24 A. It happened in every county, in every state.</p> <p>25 It wasn't just LA County.</p>	<p style="text-align: right;">Page 219</p> <p>1 A. Uh-huh.</p> <p>2 Q. Do you see at the top it starts February 26,</p> <p>3 2021?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Do you know an Alexa at The Wall Street</p> <p>6 Journal?</p> <p>7 A. I know she's on my phone. I have every --</p> <p>8 every journalist is on my phone in the whole country.</p> <p>9 Q. Okay. You like to talk to journalists, don't</p> <p>10 you, Mr. Lindell?</p> <p>11 A. Huh?</p> <p>12 Q. You like to talk to journalists?</p> <p>13 A. Do I like to talk to them?</p> <p>14 Q. Yes.</p> <p>15 A. I like to try and save our country, and I'll</p> <p>16 sit there and talk to them and tell them every</p> <p>17 conversation is to get rid of these machines and go to</p> <p>18 paper ballots hand counted.</p> <p>19 You can ask every journalist in this</p> <p>20 country that makes -- they're all on the Left because</p> <p>21 the Right ones, once again, they're afraid to talk</p> <p>22 because of lawfare.</p> <p>23 Q. Putting aside election fraud, do you like to be</p> <p>24 in the news, Mr. Lindell?</p> <p>25 A. Huh?</p>
<p style="text-align: right;">Page 218</p> <p>1 Q. Do you understand whether any of these -- that</p> <p>2 whether or not these voting companies, ES&S, Hart</p> <p>3 InterCivic, Dominion, Smartmatic, whether they're all</p> <p>4 separate companies or whether they're the same, sir?</p> <p>5 A. No, they're all separate, but they're all tied</p> <p>6 together through the Internet, because they're all</p> <p>7 online.</p> <p>8 Q. Okay.</p> <p>9 A. And I've got cast vote records for all of them.</p> <p>10 So you're all guilty.</p> <p>11 Q. Okay.</p> <p>12 A. Guilty.</p> <p>13 Q. One more document. Sir, I'm going to hand you</p> <p>14 what's been marked as Exhibit 606. Okay?</p> <p>15 (Exhibit 606 marked.)</p> <p>16 A. Okay.</p> <p>17 Q. (BY MS. WRIGLEY) For the record, this is DEF</p> <p>18 083580. This is part of a larger text chain. This one</p> <p>19 is an excerpt, Pages 1 and 35, and it's a text chain</p> <p>20 between Mike Lindell and Alexa, Wall Street Journal.</p> <p>21 Sir, are you -- can you look at the top for</p> <p>22 me, please.</p> <p>23 A. Uh-huh.</p> <p>24 Q. Do you see this is a text chain between</p> <p>25 yourself and Alexa at The Wall Street Journal?</p>	<p style="text-align: right;">Page 220</p> <p>1 Q. Do you like to be in the news?</p> <p>2 A. Do I like to be in the news? Only to try and</p> <p>3 save our country.</p> <p>4 Q. Okay.</p> <p>5 A. My voice, if you suppress that --</p> <p>6 Q. And prior to the 2020 election --</p> <p>7 A. If you read my book, you know I was very much</p> <p>8 afraid of public speaking, if you've read my book, and I</p> <p>9 think you should.</p> <p>10 Q. Mr. Lindell, let me ask you this: Prior to</p> <p>11 2020, did you like to be in the news, sir?</p> <p>12 A. Prior to 2020, the only thing I was in the</p> <p>13 news -- not prior to 2020. You're going to have to go</p> <p>14 back when I first went on TV with MyPillow if you want</p> <p>15 me to take you back to the transition. I was petrified</p> <p>16 to talk in front of any crowds.</p> <p>17 I could do commercials for MyPillow.</p> <p>18 Because when I have a compassion or passion for</p> <p>19 something, when I believe in something, I don't stop. I</p> <p>20 can talk your ear off. But when I -- if something --</p> <p>21 just smalltalk or talking, no. No.</p> <p>22 Q. In 2021, how many media appearances do you</p> <p>23 think you did?</p> <p>24 A. I have no idea. Not as -- probably not as many</p> <p>25 as 2020, because 2020 when I was banned from talking.</p>

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<p style="text-align: right;">Page 221</p> <p>1 Q. Why do you have all these journalists' numbers 2 in your phone? 3 A. What's that? 4 Q. Why do you have all these numbers in your 5 phone? 6 A. Because they attack me every single day or 7 almost weekly to do stories. They do it for their 8 glamour stories, that Mike Lindell, this conspiracy. 9 Mike Lindell's losing MyPillow. Mike Lindell just lost 10 another hundred million. Will he ever shut up? Mike 11 Lindell, you know. The Wall Street Journal, they're 12 all -- what I do now is I make them read my book, and 13 then they're torn, like when I was on Jimmy Kimmel. 14 But I will do whatever it takes to get the 15 word out to save our country, and that's it. And this 16 has nothing to do with Republican or Democrat. It has 17 to do with get rid of computers in our election, period. 18 Why do you think I'm being attacked now? 19 It's not over the 2020 election. It's because I came 20 out with a plan last August to secure our elections. 21 I -- we're going county by county to get rid of these -- 22 THE COURT REPORTER: Slow down, please. 23 A. We're going county by county to get rid of 24 these voting machines. We've got over 250 committed to 25 go to paper ballots hand counted.</p>	<p style="text-align: right;">Page 223</p> <p>1 of retailers who dropped MyPillow?" Do you see that? 2 A. Yes. 3 Q. And then you say, "Yes," correct? 4 A. Uh-huh. Yes. 5 Q. And so she's asking for information from you, 6 and you're providing it, correct? 7 A. That's correct. 8 Q. And this is The Wall Street Journal, right? 9 A. Right. 10 Q. Okay. Then she says, "Thank you. I will 11 affirm message about that." Do you see that? 12 A. Yes. 13 Q. And she seems pretty friendly in this text to 14 you, correct? 15 A. They all -- they all act that way. 16 Q. Okay. And then do you see that she also says, 17 "Hi, Mike. It's Alexa from WSJ. Have you been served 18 with the Dominion lawsuit yet?" Do you see that? 19 A. Yep. Yes. 20 Q. And it continues on the next page. This is 21 January 18, 2022. 22 A. Yeah. 23 Q. "Hi, Mike. It's Alexa Corse from The Wall 24 Street Journal. Do you have a comment on Smartmatic 25 suing you today?" Do you see that?</p>
<p style="text-align: right;">Page 222</p> <p>1 Q. (BY MS. WRIGLEY) You personally are going 2 county by county, sir? 3 A. My team. I have over 300,000 people in all 50 4 states. 5 Q. Now, if you can look at Exhibit 606, please. 6 A. Uh-huh. 7 Q. This chain starts on February 16, 2021. Do you 8 see that? 9 A. Uh-huh. 10 Q. And Alexa from The Wall Street Journal texts 11 you. "Hi, Mike. It's Alexa Corse from The Wall Street 12 Journal." 13 A. Yeah. 14 Q. "I'm sorry we didn't connect last week. Do you 15 have ten minutes to chat on the phone today about voting 16 machines?" Do you see that? 17 A. Uh-huh. 18 Q. And then on the 22nd of February, 2021, she 19 texts you. "Hi, Mike. I just E-mailed you Dominion's 20 lawsuit." Do you see that? 21 A. Uh-huh. 22 Q. And you said "Thanks," correct? Do you see 23 that? 24 A. Yes. 25 Q. She responds, "Hi, Mike. Can you send the list</p>	<p style="text-align: right;">Page 224</p> <p>1 A. Yeah. 2 Q. And you wrote her back, correct? 3 A. Yes. 4 Q. And you wrote, "It's a great day for America!" 5 A. That's correct. 6 Q. And you were glad Smartmatic sued you, correct? 7 A. What's that? 8 Q. You were glad that Smartmatic sued you? 9 A. Both of you, because we could finally get the 10 evidence, the terabytes in your hands, which you have in 11 your hands. You've had them for a long time now. 12 Q. And, Mr. Lindell, you essentially provoked 13 Smartmatic into suing you, correct? 14 A. Provoked what? 15 Q. You essentially provoked Smartmatic into suing 16 you, correct? 17 A. No. No, that's not true at all. 18 Q. What -- 19 A. Because remember, my lawyer sued them first. 20 Smartmatic tried to hide, like all the machine 21 companies, of all the corruption of their machines being 22 online, and I want to save our country. I care about 23 America and I care about my children and grandchildren. 24 That's all I care about is saving our country. 25 And I'm sorry you work for a company that</p>

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<p style="text-align: right;">Page 225</p> <p>1 has electronic voting machines. Nothing against you</p> <p>2 personally. You're just doing your job. You picked a</p> <p>3 bad company to work for.</p> <p>4 Q. Mr. --</p> <p>5 A. But the reason I say it's a great day for</p> <p>6 America, because finally we could get exposed and get</p> <p>7 exposes. But we learned so much in the last three</p> <p>8 years. We were able to get the cast vote records from</p> <p>9 LA County. We were able to find out China directly</p> <p>10 involved with LA County. So many things now that we</p> <p>11 have on you guys, I don't even know why we're here, but</p> <p>12 that's okay. We go through the process.</p> <p>13 Q. Mr. Lindell, you came out with "Absolute Proof"</p> <p>14 in -- on February 5th --</p> <p>15 A. Yeah.</p> <p>16 Q. -- 2021, correct?</p> <p>17 A. Right.</p> <p>18 Q. And Smartmatic hadn't sued you by that time,</p> <p>19 right?</p> <p>20 A. That's correct.</p> <p>21 Q. And you mentioned Smartmatic in that</p> <p>22 documentary, correct?</p> <p>23 A. Yeah.</p> <p>24 Q. And you did a number of documentaries in the</p> <p>25 months after "Absolute Proof" where you, again,</p>	<p style="text-align: right;">Page 227</p> <p>1 move to strike as nonresponsive.</p> <p>2 Q. (BY MS. WRIGLEY) Let me ask you this: When</p> <p>3 "Absolute Proof" came out, had Smartmatic sued you at</p> <p>4 that point in time?</p> <p>5 A. No. You just sued Fox News.</p> <p>6 Q. Okay. And when you put out "Absolute</p> <p>7 Interference," had Smartmatic sued you at that point in</p> <p>8 time, sir?</p> <p>9 A. No.</p> <p>10 Q. Okay. When you put out "Scientific Proof," had</p> <p>11 Smartmatic sued you at that point in time?</p> <p>12 A. Nope. They waited a year.</p> <p>13 Q. Okay. And you mentioned Smartmatic being</p> <p>14 involved in the 2020 election in both "Scientific Proof"</p> <p>15 and "Absolute Interference," correct?</p> <p>16 A. I don't know. I haven't seen Scientific Proof.</p> <p>17 I think that was Doug Frank, and he's a scientist.</p> <p>18 Q. Now, you also did a Cyber Symposium in August</p> <p>19 of 2021, correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And that was over the course of one or</p> <p>22 two days, correct?</p> <p>23 A. Three days.</p> <p>24 Q. Three days. And you mentioned Smartmatic in</p> <p>25 connection with that Cyber Symposium?</p>
<p style="text-align: right;">Page 226</p> <p>1 mentioned Smartmatic in connection with election fraud,</p> <p>2 correct?</p> <p>3 A. Uh-huh.</p> <p>4 Q. And Smartmatic had not sued you in those</p> <p>5 months, correct?</p> <p>6 A. You know, I watched the movie Kill Chain.</p> <p>7 Okay?</p> <p>8 Q. Mr. Lindell --</p> <p>9 A. I watched the movie Kill Chain -- let me</p> <p>10 finish. You say that.</p> <p>11 And in Kill Chain, my own senator, Amy</p> <p>12 Klobuchar, she's a Democrat, and Kamala Harris, the Vice</p> <p>13 President, they all mention in there, hey, these four</p> <p>14 companies control all our elections, and they said,</p> <p>15 we've got to stop this. And they name Smartmatic, Hart,</p> <p>16 Dominion and one other one.</p> <p>17 And Amy Klobuchar, you guys didn't sue her.</p> <p>18 Was that provoking you? She was -- her freedom of</p> <p>19 speech. It's the movie Kill Chain. I watched it. I'm</p> <p>20 going, wow, even the Democrats want these machine</p> <p>21 companies gone. You guys -- was that provoking you?</p> <p>22 No. That was their concern because of these machines.</p> <p>23 She -- you just happen to be one of the brands. That's</p> <p>24 it.</p> <p>25 MS. WRIGLEY: Mr. Lindell, I'm going to</p>	<p style="text-align: right;">Page 228</p> <p>1 A. I don't know if I did. I mentioned all</p> <p>2 machines there, every state.</p> <p>3 Q. And had Smartmatic sued you at that point, sir?</p> <p>4 A. No.</p> <p>5 Q. And in promoting "Absolute Interference," you</p> <p>6 talked to Steve Bannon and you talked to Dan Ball on One</p> <p>7 America News, and you basically said that you wanted</p> <p>8 Smartmatic to sue you, correct?</p> <p>9 A. Yeah, so we could get the evidence out there</p> <p>10 because --</p> <p>11 Q. And you wanted Dominion to sue you, correct?</p> <p>12 A. So we could get the evidence, correct.</p> <p>13 Q. And at that time point in time, Smartmatic had</p> <p>14 not sued you, correct?</p> <p>15 A. That's correct.</p> <p>16 Q. And then later that year, at the end of 2021,</p> <p>17 you, yourself sued Smartmatic, correct?</p> <p>18 A. No. That was early in '21, but the lawyers</p> <p>19 sued Smartmatic.</p> <p>20 Q. Smartmatic or Dominion, sir?</p> <p>21 A. Smartmatic and Do- -- no, just -- I don't know.</p> <p>22 Both, I guess --</p> <p>23 Q. And --</p> <p>24 A. -- after Dominion had sued me.</p> <p>25 Q. Your claims against Dominion were dismissed by</p>

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<p style="text-align: right;">Page 229</p> <p>1 a federal judge, correct?</p> <p>2 A. Yes, on the second day of the Cyber Symposium.</p> <p>3 Very suspicious.</p> <p>4 Q. And you find that dismissal suspicious,</p> <p>5 correct?</p> <p>6 A. Yeah, very suspicious.</p> <p>7 Q. Okay. And you think that there's a federal</p> <p>8 judge in the District of Columbia involved in protecting</p> <p>9 Smartmatic, right?</p> <p>10 A. Here's my statement to that: I find it very</p> <p>11 strange that Smartmatic would not have opened up their</p> <p>12 machines for the world and say, hey, we don't have</p> <p>13 nothing to hide.</p> <p>14 And then they sue, not Mike Lindell, but</p> <p>15 they sue MyPillow a year later, that it was some</p> <p>16 elaborate scheme for their CEO to make money using promo</p> <p>17 codes, when we -- at that point, we had lost \$300</p> <p>18 million, and we were in disarray. And I'm a pretty good</p> <p>19 marketer. You said it earlier in the -- I think you're</p> <p>20 a pretty good marketer. I think I'd quit doing</p> <p>21 something like that if I didn't believe what I was</p> <p>22 doing. It doesn't matter if we don't have a country.</p> <p>23 You know, that's the whole point.</p> <p>24 Q. Mr. Lindell, I want to ask you a couple of</p> <p>25 questions about Smartmatic. Who's the CEO of</p>	<p style="text-align: right;">Page 231</p> <p>1 Q. Who?</p> <p>2 A. I'm not naming his name. It's a whistleblower.</p> <p>3 Q. It's a whistleblower. What's his name, sir?</p> <p>4 A. I'm not naming your name -- a name -- a name.</p> <p>5 I don't know it right now. I can't even remember.</p> <p>6 Q. When did he work for Smartmatic?</p> <p>7 A. Huh?</p> <p>8 Q. When did he work for Smartmatic?</p> <p>9 A. I think in 2020.</p> <p>10 Q. What did he do?</p> <p>11 A. I don't know. I don't know right now.</p> <p>12 Q. How do you know he worked for Smartmatic?</p> <p>13 A. I don't know that either.</p> <p>14 Q. Okay.</p> <p>15 A. You asked me if I knew an employee. He said he</p> <p>16 was.</p> <p>17 Q. How many countries does Smartmatic provide</p> <p>18 election technology or services for in the world, sir?</p> <p>19 A. I don't know that. I know that it's very</p> <p>20 corrupt in the Philippines. I'm friends with a lot of</p> <p>21 people in the Philippines, senators and stuff, and I</p> <p>22 know they got into all kinds of trouble with the</p> <p>23 corruption. I know there's a big lawsuit against them</p> <p>24 going on in Florida right now for all the stuff they've</p> <p>25 done overseas. I don't know the details on it. I heard</p>
<p style="text-align: right;">Page 230</p> <p>1 Smartmatic?</p> <p>2 A. I don't know right now. I have all that data.</p> <p>3 I don't have it right now in front of me.</p> <p>4 Q. Okay. How many employees does Smartmatic have</p> <p>5 in the United States?</p> <p>6 A. I don't know currently.</p> <p>7 Q. Okay.</p> <p>8 A. Don't know -- do you know how many I have? I</p> <p>9 don't know how many you have.</p> <p>10 Q. I do now how many you have, sir.</p> <p>11 But I want to ask you about Smartmatic.</p> <p>12 Are you aware that Smartmatic employs people who work in</p> <p>13 the United States, sir?</p> <p>14 A. I know they've got a lot overseas, too, but</p> <p>15 yeah, they've got some, I suppose, in the United States.</p> <p>16 Q. Okay. Okay. And do you know where Smartmatic</p> <p>17 has offices in the United States?</p> <p>18 A. I think I know where a couple are, but I don't</p> <p>19 know now.</p> <p>20 Q. Have you ever been to one of the offices of</p> <p>21 Smartmatic?</p> <p>22 A. No.</p> <p>23 Q. Okay. Have you ever talked to an employee of</p> <p>24 Smartmatic, sir?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 232</p> <p>1 it's going to break everything open, and all this goes</p> <p>2 away, too.</p> <p>3 MS. WRIGLEY: Okay. I'm going to move to</p> <p>4 strike as nonresponsive.</p> <p>5 Q. (BY MS. WRIGLEY) How many countries do you</p> <p>6 know, one way or the other, Smartmatic provides election</p> <p>7 technology and services in the world?</p> <p>8 A. I don't know that, their current footprint.</p> <p>9 Q. Okay. How long has Smartmatic been in</p> <p>10 business, sir?</p> <p>11 A. I believe since around the year 2000.</p> <p>12 Q. Around the year 2000. And how do you know</p> <p>13 that?</p> <p>14 A. Huh?</p> <p>15 Q. How do you know that?</p> <p>16 A. From the research this guy did that we paid a</p> <p>17 quarter million dollars to do massive research and deep</p> <p>18 dive into the genesis of Smartmatic. We have little</p> <p>19 charts of all the people that -- this corrupt guy over</p> <p>20 here, this guy and this guy over here and this guy.</p> <p>21 It -- this was a massive report we got.</p> <p>22 Q. And who did you pay that -- who did you pay to</p> <p>23 do that report on Smartmatic, sir?</p> <p>24 A. I'd have to get the name from my lawyer.</p> <p>25 That's -- I had a different lawyer then. We -- he hired</p>

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<p style="text-align: right;">Page 233</p> <p>1 them at that time, this whole company. I don't know --</p> <p>2 I don't remember his name.</p> <p>3 Q. Now, if you can look back to Exhibit 606, at</p> <p>4 the end of this text that you're having with The Wall</p> <p>5 Street Journal, do you see at the end you texted her and</p> <p>6 said, "I am so happy they finally sued me...now we can</p> <p>7 add them to the evidence and depose them"?</p> <p>8 A. That's right.</p> <p>9 Q. "Now, if ES&S voting machines would hurry up</p> <p>10 and sue...we would have the most" -- "we would have most</p> <p>11 of the corrupt machine companies." Do you see that?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. Do you recall being on Pete Santilli's</p> <p>14 show to talk about Smartmatic in 2021?</p> <p>15 A. I have no idea. I just -- no idea.</p> <p>16 Q. Do you know who Pete San- --</p> <p>17 A. I know who Pete Santilli is.</p> <p>18 Q. Did you appear on Pete Santilli's show?</p> <p>19 A. I don't know.</p> <p>20 Q. Did you appear on Mr. Santilli's show in 2021?</p> <p>21 A. I don't know.</p> <p>22 Q. Did you appear on that show and talk about</p> <p>23 Smartmatic in 2021?</p> <p>24 A. I don't know.</p> <p>25 MS. WRIGLEY: Okay. We're going to take a</p>	<p style="text-align: right;">Page 235</p> <p>1 number of screenshots from that, and I want to walk</p> <p>2 through some of them with you, Mr. Lindell.</p> <p>3 A. Uh-huh.</p> <p>4 Q. Do you see screenshot A, which is the first</p> <p>5 page in, and it says, "Mike Lindell presents 'Absolute</p> <p>6 Interference'"? Do you see that image?</p> <p>7 A. Yep.</p> <p>8 Q. Do you recognize that as an image that appeared</p> <p>9 in connection with your "Absolute Interference"</p> <p>10 documentary?</p> <p>11 A. The "Absolute Proof" [sic] one, right? If I</p> <p>12 had a chance, I do, yes.</p> <p>13 Q. And the subtitles here states, "The sequel to</p> <p>14 'Absolute Proof' with new evidence foreign and domestic</p> <p>15 enemies used computers to hack the 2020 election." Do</p> <p>16 you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And was that the subtitle for "Absolute</p> <p>19 Interference"?</p> <p>20 A. Yes. Yes.</p> <p>21 Q. And "Absolute Interference" has as the subject</p> <p>22 matter "Hacking the 2020 Election," correct?</p> <p>23 A. Yes.</p> <p>24 Q. Now, if I go to screenshot B, do you see where</p> <p>25 it says "A hundred percent cyber attack"?</p>
<p style="text-align: right;">Page 234</p> <p>1 break for lunch.</p> <p>2 THE WITNESS: Okay.</p> <p>3 THE VIDEOGRAPHER: And we're going off the</p> <p>4 record at 1:15.</p> <p>5 (Lunch recess.)</p> <p>6 (Exhibits 607-610 marked.)</p> <p>7 THE VIDEOGRAPHER: And we're back on the</p> <p>8 record at 1:45.</p> <p>9 Q. (BY MS. WRIGLEY) Mr. Lindell, I'm going to</p> <p>10 hand you Exhibit 611.</p> <p>11 (Exhibit 611 marked.)</p> <p>12 A. Okay.</p> <p>13 Q. (BY MS. WRIGLEY) For the record, this was</p> <p>14 marked as an exhibit to the complaint, and it contains</p> <p>15 screenshots from "Absolute Interference."</p> <p>16 And actually, before I ask you some</p> <p>17 questions about this, do you recall putting out a</p> <p>18 documentary movie called "Absolute Interference"?</p> <p>19 A. Yes.</p> <p>20 Q. And when did you release "Absolute</p> <p>21 Interference"?</p> <p>22 A. I think around the end of April '21.</p> <p>23 Q. Okay. April of '21?</p> <p>24 A. April of '21.</p> <p>25 Q. Okay. Looking at Exhibit 611, it's got a</p>	<p style="text-align: right;">Page 236</p> <p>1 A. Uh-huh.</p> <p>2 Q. Do you recognize that as being part of the</p> <p>3 "Absolute Interference" documentary?</p> <p>4 A. I don't know. If you say so. I don't know.</p> <p>5 Q. Okay. Let's go to screenshot C, see if you</p> <p>6 recognize this image.</p> <p>7 A. Yeah, I recognize that.</p> <p>8 Q. Okay. And that's yourself, correct?</p> <p>9 A. Yes.</p> <p>10 Q. And you were one of the presenters of "Absolute</p> <p>11 Interference"?</p> <p>12 A. I was the host.</p> <p>13 Q. You were the host. Okay.</p> <p>14 And if you turn to the next page,</p> <p>15 screenshot D, do you see that you appear on that</p> <p>16 screenshot?</p> <p>17 A. With General Flynn, yes.</p> <p>18 Q. And the individual on screenshot D is General</p> <p>19 Michael Flynn?</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. And did you do a discussion with General</p> <p>22 Michael Flynn in "Absolute Interference"?</p> <p>23 A. I don't know. I'd have to watch it. I guess.</p> <p>24 Q. Okay.</p> <p>25 A. He was in the show.</p>

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<p style="text-align: right;">Page 237</p> <p>1 Q. He appeared -- General Michael Flynn appeared 2 on "Absolute Interference"?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Okay. Now, let me have you flip a few 5 screenshots back, and I'm going to take you to 6 screenshot G and ask you about what appears there. And 7 let me know when you're there.</p> <p>8 A. Which one?</p> <p>9 Q. G. Like the --</p> <p>10 A. G like --</p> <p>11 Q. Yeah.</p> <p>12 A. Okay. Yep. After Doug Frank.</p> <p>13 Q. Do you see yourself on the screenshot?</p> <p>14 A. Yes.</p> <p>15 Q. And there's a gentleman with you here, correct?</p> <p>16 A. Yep.</p> <p>17 Q. Who is this gentleman?</p> <p>18 A. That's Dr. Douglas Frank.</p> <p>19 Q. Okay. And Dr. Douglas Frank appeared on 20 "Absolute Interference," correct?</p> <p>21 A. Correct.</p> <p>22 Q. And Dr. Douglas Frank presented with you about 23 evidence he contended show that there was fraud in the 24 2020 presidential election, correct?</p> <p>25 A. Hundred percent, yes.</p>	<p style="text-align: right;">Page 239</p> <p>1 Like I said, these were all picked by -- probably by 2 Mary Fanning, all the guests, again. I have -- some of 3 them I've never met these people, most of them.</p> <p>4 Dr. Frank -- just so you know, Dr. Frank, 5 first time I met him, when this was filmed, it was so 6 intriguing and so like answers to everything, because he 7 had found an algorithm from another direction, that I 8 stopped the presses, and that's when we did "Scientific 9 Proof," the same day it was filmed, a completely 10 one-hour segment.</p> <p>11 Q. Now, if you go to screenshot K --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- do you recognize this from "Absolute 14 Interference"?</p> <p>15 A. Who?</p> <p>16 Q. Do you recognize the image from screenshot K?</p> <p>17 A. I do, but I don't see the guy's picture.</p> <p>18 Q. Okay. Did you have a sit-down with an 19 individual whose face was blurred out in "Absolute 20 Interference"?</p> <p>21 A. I don't know. I didn't know it was blurred 22 out. This is the first time I've seen this.</p> <p>23 Q. Do you know who this individual is?</p> <p>24 A. No, I don't.</p> <p>25 Q. Did you know at the time?</p>
<p style="text-align: right;">Page 238</p> <p>1 Q. Okay. And let me have you flip back to 2 screenshot J.</p> <p>3 A. Screenshot J.</p> <p>4 Q. Do you recognize this image from "Absolute 5 Interference"?</p> <p>6 A. Right here, this thing?</p> <p>7 Q. Yes.</p> <p>8 A. Yes.</p> <p>9 Q. And do you see where it says, "On the phone 10 with confidential informant number 3"? Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Who was this confidential informant number 3?</p> <p>13 A. You know, I don't know. It could have been 14 Conan Hayes. I don't know.</p> <p>15 Q. Did you know who it was at the time --</p> <p>16 A. Yes. Yes.</p> <p>17 Q. -- that this appeared on the phone?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. My guess is Conan Hayes, but I don't know. I 21 can't -- I'm not going to say if I'm 98 percent sure.</p> <p>22 Q. Okay. And why was it number 3? Was there any 23 significance to identifying him as confidential 24 informant number 3?</p> <p>25 A. I didn't put that on there. I don't know.</p>	<p style="text-align: right;">Page 240</p> <p>1 A. I -- I didn't know his name. I -- you know, I 2 remember there were a lot of people there. I still 3 don't know their name, because there was a lot of people 4 brought in from other states, and these were all 5 different people. I don't -- I have no idea that guy's 6 name or who he was.</p> <p>7 Q. Okay. Now, if I could have you turn back to 8 the very -- actually, back to the screenshot we looked 9 at that had the confidential informant number 3, 10 screenshot J.</p> <p>11 A. Yeah. Number what?</p> <p>12 Q. J.</p> <p>13 A. Oh, J. I'm sorry. Yeah.</p> <p>14 Q. Do you see the image at the bottom right-hand 15 corner where it has sort of the cover shot of Absolute 16 Interference with the maps?</p> <p>17 A. This here?</p> <p>18 Q. Yeah.</p> <p>19 A. Yes, I see it.</p> <p>20 Q. And then do you see at the bottom it says, 21 "Executive producers, Mike Lindell, Brannon Howse and 22 Mary Fanning"?</p> <p>23 A. Correct.</p> <p>24 Q. And were those the executive producers of 25 "Absolute Interference"?</p>

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<p style="text-align: right;">Page 241</p> <p>1 A. Were they? Yeah, same people as "Absolute 2 Proof." 3 Q. Okay. So you produced "Absolute Interference" 4 with Brannon Howse and Mary Fanning? 5 A. All I did was host. I had no idea what I was 6 going to say. Brannon did all the filming and 7 production, and Mary Fanning provided the content, all 8 the guests. 9 Q. Before this was released, "Absolute 10 Interference," did you intend for Smartmatic to be named 11 as part of an election fraud conspiracy? 12 A. I didn't know what was going to be said by 13 these guys. I had no clue, absolutely no clue. 14 Q. You didn't have any clue what any of these 15 individuals were going to say before Absolute 16 Interference? 17 A. No. Absolutely none. They said we're bringing 18 in a hole other crew group and they're getting more 19 witnesses, more evidence. Dr. Doug Frank was the most 20 amazing because he got all his evidence right from the 21 counties and the states. 22 Q. Well, let's -- I'm going to play a couple clips 23 from "Absolute Interference." 24 A. Okay. 25 Q. It's a little bit long. So this is clips just</p>	<p style="text-align: right;">Page 243</p> <p>1 Q. Did you identify Smartmatic in that? 2 A. Yeah, ES&S and Dominion. I wasn't prejudiced. 3 It was all, yeah. 4 Q. Okay. But you did mention the name Smartmatic? 5 A. Oh, yeah. Absolutely. 6 Q. Okay. All right. Let's look at 613. 7 (Clip from "Absolute Interference.") 8 MR. LINDELL: All these things that -- and 9 I kept telling them, you know what? The -- and the 10 reason they're doing that is because I have proof, a 11 hundred percent proof that our country was attacked by 12 China, by communism coming in, this foreign interference 13 to our elections through the machines, Dominion, 14 Smartmatic, ES&S, all of them. 15 (Clip ends.) 16 Q. (BY MS. WRIGLEY) And, Mr. Lindell, do you 17 recognize yourself in that video? 18 A. Oh, yeah. 19 Q. That was from "Absolute Interference," correct? 20 A. Yeah. 21 Q. And you intended to specifically reference 22 Smartmatic in connection with -- 23 A. No. No. I was all inclusive. I was not 24 prejudiced against Smartmatic. I included ES&S and 25 Dominion. I did forget Hart.</p>
<p style="text-align: right;">Page 242</p> <p>1 like -- 2 A. Okay. 3 Q. -- the rest of them. My colleague's going to 4 come around. 5 The first one is going to be marked 6 Exhibit 612. 7 A. Okay. 8 Q. The second one will be 613, and then the third 9 one will be 614. 10 (Exhibits 612-614 marked.) 11 MR. KACHOUROFF: In the future, you can 12 just do one. It doesn't need to be -- 13 (Clip from "Absolute Interference.") 14 MR. LINDELL: And it rhymes with Dominion 15 and it rhymes with Smartmatic and ES&S. All these 16 machines that were used out there cannot be done by 17 humans. And you have to have access, before, during and 18 after. 19 (Clip ends.) 20 Q. (BY MS. WRIGLEY) That was clip 1, Mr. Lindell. 21 Before I have my colleague play 613, do you 22 recognize yourself on that clip? 23 A. Uh-huh. 24 Q. And did you identify Smartmatic? 25 A. Did I what?</p>	<p style="text-align: right;">Page 244</p> <p>1 Q. But you did mention Smartmatic, correct? 2 A. Absolutely. 3 Q. Okay. Let's look at 614. 4 (Clip from "Absolute Interference.") 5 MR. LINDELL: You know, this all started 6 back in Venezuela when they took that country in a 7 couple years when Smartmatic started back then, and, you 8 know, these machines have been -- you know, it's a tool. 9 Anyone can, you know, win any election. Well, I want to 10 win this one. You know, they asked me, would you run? 11 I said, I wouldn't run for a dogcatcher right now 12 because somebody else could pick the winner. 13 (Clip ends.) 14 Q. (BY MS. WRIGLEY) Mr. Lindell -- 15 A. That's when I decided not to run for governor. 16 Q. Mr. Lindell, looking at that clip marked 614, 17 did you recognize yourself in that video clip from 18 "Absolute Interference"? 19 A. Uh-huh. 20 Q. And you -- I'm sorry. You have to -- 21 A. That's when I decided not to run for governor, 22 not that moment. But I decided way before that, because 23 if machines were involved, what's the sense? 24 Q. But that was you in the clip, correct? 25 A. Oh, absolutely.</p>

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<p style="text-align: right;">Page 245</p> <p>1 Q. And you specifically named Smartmatic in that</p> <p>2 one, correct?</p> <p>3 A. I didn't hear if I said Smartmatic at the</p> <p>4 beginning. But if I did, I did, yes. Yes. I'll say</p> <p>5 yes.</p> <p>6 Q. Okay. Now, in connection with making "Absolute</p> <p>7 Interference," did you do media appearances to discuss</p> <p>8 or promote that documentary?</p> <p>9 A. I don't think so. I don't know. They</p> <p>10 wouldn't -- you got to realize nobody would have me on,</p> <p>11 and the only -- the only ones were attack media that</p> <p>12 would have me on, unless it was Bannon, but the -- you</p> <p>13 know.</p> <p>14 Q. Did you appear with Steve Bannon on his</p> <p>15 podcast --</p> <p>16 A. I --</p> <p>17 Q. -- War Room to discuss "Absolute Interference"?</p> <p>18 A. I don't know. If FrankSpeech was done by then,</p> <p>19 I did, because I just went on -- I think this was done</p> <p>20 and I already had FrankSpeech, so I didn't need anybody</p> <p>21 else.</p> <p>22 I think I did a three-day marathon,</p> <p>23 actually. In fact, I think -- I know I did, because</p> <p>24 when this got completed, Alan Duke is a Facebook fact</p> <p>25 checker on lead stories, and him and I went back and</p>	<p style="text-align: right;">Page 247</p> <p>1 You made this film, "Absolute Proof." Came</p> <p>2 out in February, caused a huge -- you know, a huge</p> <p>3 blowup. The media, who was all excited about every one</p> <p>4 of your movies, everyone except Total Cryptics, right,</p> <p>5 all of a sudden stopped seeing any articles about this.</p> <p>6 You and Dominion finally got into this</p> <p>7 legal situation, right, where they sued you. You've now</p> <p>8 come out, and instead of either backing down or working</p> <p>9 out some deal with Dominion or working out some</p> <p>10 compromise or saying you're sorry, you've now tripled</p> <p>11 down, you've made another film called "Absolute</p> <p>12 Interference."</p> <p>13 For our audience, why were you -- are you</p> <p>14 going to -- when are you going to release this next</p> <p>15 movie, "Absolute Interference"?</p> <p>16 MR. LINDELL: Well, the one -- the one</p> <p>17 part -- the one guest was so good that I made an hour</p> <p>18 show, and we're going to release that later in the week.</p> <p>19 You can see that on LindellTV.com.</p> <p>20 Then -- and then the following week, we'll</p> <p>21 release out "Absolute Interference," and that could --</p> <p>22 so it could be later in the week. We haven't set the</p> <p>23 exact date on that yet.</p> <p>24 I kind of want to line that up with my --</p> <p>25 launching my new social media platform, which will be</p>
<p style="text-align: right;">Page 246</p> <p>1 forth. And he actually put up false information over it</p> <p>2 when it was released, within 20 minutes, and he couldn't</p> <p>3 have even watched it. So I was very upset with him.</p> <p>4 By the way, we gave Alan Duke all the</p> <p>5 evidence, and they validated it, and then he said,</p> <p>6 well -- he says, I -- Mike, I can't go public with it</p> <p>7 because we only say if something's false, not if it's</p> <p>8 true.</p> <p>9 Q. I'm going to show you a clip from an appearance</p> <p>10 on Bannon's War Room.</p> <p>11 MS. WRIGLEY: For the record, I'm going to</p> <p>12 mark this first clip as 615. The second clip will be</p> <p>13 616.</p> <p>14 (Exhibits 615-616 marked.)</p> <p>15 Q. (BY MS. WRIGLEY) For the record, my</p> <p>16 understanding is is this is from a March 26, 2021</p> <p>17 appearance on War Room.</p> <p>18 We'll watch these two clips, and then I'll</p> <p>19 ask you questions.</p> <p>20 MR. KACHOUROFF: 615 and 616?</p> <p>21 MS. WRIGLEY: Yes.</p> <p>22 (Clip of Steve Bannon and Mike Lindell.)</p> <p>23 STEVE BANNON: I want to go back to Mike</p> <p>24 Lindell. So, Mike, I just want to put this in</p> <p>25 perspective for our audience.</p>	<p style="text-align: right;">Page 248</p> <p>1 Frank. But this -- when you watch this -- and all of</p> <p>2 you've see "Absolute Proof," you know, we're just going</p> <p>3 to keep dropping more and more.</p> <p>4 It's going to be to the point that the only</p> <p>5 announcement I'll be able to make is, hey, if you work</p> <p>6 for Dominion and you were part of this crime against</p> <p>7 humanity, turn yourself in, save yourself some jail</p> <p>8 time. That's all I can say. I mean, I don't know what</p> <p>9 else to say to these people.</p> <p>10 (Clip ends.)</p> <p>11 Q. (BY MS. WRIGLEY) We'll look at the next clip,</p> <p>12 616, from the same War Room podcast.</p> <p>13 A. Let it be known, I didn't say Smartmatic there.</p> <p>14 Did you catch that? Just for kicks.</p> <p>15 (Clip of Steve Bannon and Mike Lindell.)</p> <p>16 MR. LINDELL: Everything you were bringing</p> <p>17 up before, you know, when you were going, oh, there was,</p> <p>18 you know, dead people voting and there was nonresidents</p> <p>19 voting, I mean, you should -- Donald Trump should have</p> <p>20 been put back in just for that alone. All these</p> <p>21 nonresidents that voted, all the cheating. I call that</p> <p>22 organic cheating.</p> <p>23 What I'm calling here is what they -- what</p> <p>24 foreign countries like China came in and attacked our</p> <p>25 country using these machines, Dominion, Smartmatic,</p>

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<p style="text-align: right;">Page 249</p> <p>1 ES&S, all these machines.</p> <p>2 Now, I want to ask everybody something</p> <p>3 here. You know, you say, well, can the Supreme Court --</p> <p>4 well, look. They've never seen this before, so they</p> <p>5 can't turn down something they never seen. This is the</p> <p>6 evidence -- this is the smoking gun evidence.</p> <p>7 But I wanted -- I want to put a -- ask</p> <p>8 everybody out there this: You know, ask yourself if</p> <p>9 MyPillow -- if everybody out there said there were rocks</p> <p>10 and knives in MyPillow's, you know what I would do,</p> <p>11 being a -- maybe a smart kind of business owner and</p> <p>12 businessman, I'd say, hey, guys, everybody come and</p> <p>13 look. There's no knives or rocks. Hello. Okay?</p> <p>14 Instead, Dominion, when they have been</p> <p>15 asked to look at these machines, the first case was</p> <p>16 Jan -- November 9th. That's the first person they sued.</p> <p>17 One of their employees sued then. One of their officers</p> <p>18 sued a person in Colorado. And from that point on,</p> <p>19 there's --</p> <p>20 STEVE BANNON: We're going to run out of</p> <p>21 time.</p> <p>22 MR. LINDELL: -- there's over 200 threats</p> <p>23 and lawsuits from Dominion, Smartmatic and the other</p> <p>24 machine people.</p> <p>25 Now, why wouldn't they have just made it</p>	<p style="text-align: right;">Page 251</p> <p>1 Mr. Bannon your documentary, "Absolute Inference,"</p> <p>2 coming out?</p> <p>3 A. Yeah. We -- like I said, we watched that</p> <p>4 one-hour one, "Scientific Proof" first.</p> <p>5 Q. Okay. The -- the one-hour one, "Scientific</p> <p>6 Proof," that was with Dr. Douglas Frank, correct?</p> <p>7 A. Right. It's with the same -- when we filmed</p> <p>8 "Absolute Interference," his was so like (oral noise)</p> <p>9 that I said, stop everything. And everything -- you've</p> <p>10 got to realize when we filmed that that we didn't</p> <p>11 practice. That was all live. It was just like I'm</p> <p>12 hearing it the first time you did. So it was like -- it</p> <p>13 was like, are you kidding? All of his stuff came right</p> <p>14 from the States, right out of the machines. So you</p> <p>15 can't argue with that.</p> <p>16 Mine, you could say, oh, you've got to have</p> <p>17 a cyber guy to look at the evidence. Here, he had it</p> <p>18 right from the voter rolls, right from the secretary of</p> <p>19 states. So that was really interesting, me going, wow,</p> <p>20 it matches perfect. Another foundation of my evidence I</p> <p>21 had from Dennis Montgomery.</p> <p>22 Q. Did Douglas Frank's evidence identify</p> <p>23 Smartmatic as being involved in --</p> <p>24 A. All machines.</p> <p>25 Q. -- interfering with the 2020 election?</p>
<p style="text-align: right;">Page 250</p> <p>1 easier and say, hey, guys, look inside the machine.</p> <p>2 There's nothing to hide.</p> <p>3 (Clip ends.)</p> <p>4 Q. (BY MS. WRIGLEY) Now, looking at that</p> <p>5 Exhibit 616, Mr. Lindell, did you recognize yourself?</p> <p>6 A. Oh, yeah.</p> <p>7 Q. And that was you on -- with Mr. Steve Bannon,</p> <p>8 correct?</p> <p>9 A. Yeah. Yeah.</p> <p>10 Q. And in that one, you specifically mentioned</p> <p>11 Smartmatic, right?</p> <p>12 A. Right. Right. Right.</p> <p>13 Q. And you had said Smartmatic, along with</p> <p>14 Dominion and ES&S, were involved in trying to --</p> <p>15 A. Right. Why didn't they just show their cards,</p> <p>16 right? Exactly. I said, why wouldn't they just show --</p> <p>17 show us their side. Tell them, hey, show it if there's</p> <p>18 nothing to hide. These are government companies.</p> <p>19 They're not private companies. They work for us.</p> <p>20 Q. And you had indicated Smartmatic was involved</p> <p>21 in a crime or attack against the country?</p> <p>22 A. They were -- they were -- yes. And Smartmatic,</p> <p>23 all the machine companies, yes. This is what happened,</p> <p>24 show us the data.</p> <p>25 Q. And you were discussing on this appearance with</p>	<p style="text-align: right;">Page 252</p> <p>1 A. All machines companies. All machines. But if</p> <p>2 you lied and said you weren't online, it was a coverup.</p> <p>3 Now, did it say like every county, including LA County,</p> <p>4 which has those same algorithms, those same exact</p> <p>5 algorithms.</p> <p>6 Q. So --</p> <p>7 A. We have proof of that. It's --</p> <p>8 Q. -- it's your understanding at the time of</p> <p>9 "Scientific Proof" that Dr. Douglas Frank's evidence</p> <p>10 implicated Smartmatic specifically in the 2020 election?</p> <p>11 A. Implicated all machine companies, because</p> <p>12 they're the same.</p> <p>13 Q. But I'm asking about Smartmatic, sir.</p> <p>14 A. Yeah, they're -- LA County, absolutely. He</p> <p>15 even said it. I said all machines. If you watch the</p> <p>16 rest of "Scientific Proof," you'll see -- you're leaving</p> <p>17 that part out -- he says 100 percent they all -- it</p> <p>18 implicates them all.</p> <p>19 Q. Now --</p> <p>20 A. Dr. Frank said that, who's a genius. He's got</p> <p>21 a 200 IQ. He teaches -- he's a rocket scientist.</p> <p>22 Q. Now, Mr. Lindell, at the time of "Scientific</p> <p>23 Proof" and "Absolute Interference" being released, you</p> <p>24 were aware that both Dominion and Smartmatic had filed</p> <p>25 lawsuits against news companies for making false</p>

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<p style="text-align: right;">Page 253</p> <p>1 statements about their companies being involved in</p> <p>2 rigging the 2020 election, correct?</p> <p>3 A. Say that again.</p> <p>4 Q. At the time "Scientific Proof" and --</p> <p>5 A. Right.</p> <p>6 Q. -- "Absolute Interference" were released, you</p> <p>7 were aware that both Smartmatic and Dominion had filed</p> <p>8 lawsuits against news organizations related to</p> <p>9 accusations of them being involved with the 2020</p> <p>10 election?</p> <p>11 A. Yeah. You guys -- yeah. You hurt me pretty</p> <p>12 bad there, my company.</p> <p>13 Q. And you were --</p> <p>14 A. Correct.</p> <p>15 Q. You were aware that in the Smartmatic lawsuit</p> <p>16 against FOX, Smartmatic asserted that it had nothing to</p> <p>17 do with rigging the 2020 election, correct?</p> <p>18 A. That's what you guys were saying. That's what</p> <p>19 the public was saying -- or the -- I mean, the media was</p> <p>20 saying, yeah.</p> <p>21 Q. And you knew that before "Absolute</p> <p>22 Interference" and "Scientific Proof"?</p> <p>23 A. Hundred percent, but I had evidence on you.</p> <p>24 Why would I -- why would that change my mind?</p> <p>25 Q. Evidence from Dennis Montgomery?</p>	<p style="text-align: right;">Page 255</p> <p>1 second.</p> <p>2 THE VIDEOGRAPHER: We're going off the</p> <p>3 record at 2:04.</p> <p>4 (Off the record.)</p> <p>5 THE VIDEOGRAPHER: Okay. We're back on</p> <p>6 record at 2:05.</p> <p>7 Q. (BY MS. WRIGLEY) I want to ask you some</p> <p>8 questions about "Scientific Proof."</p> <p>9 A. Uh-huh.</p> <p>10 Q. I'm going to hand you Exhibit 607.</p> <p>11 MR. KACHOUROFF: 607?</p> <p>12 MS. WRIGLEY: Yes. I'm backtracking a</p> <p>13 little bit. I had exhibits marked.</p> <p>14 Q. (BY MS. WRIGLEY) This was, for the record,</p> <p>15 marked as Exhibit 4 to Smartmatic's complaint.</p> <p>16 Can you look at the first screenshot,</p> <p>17 screenshot A, and see if you recognize that image there?</p> <p>18 A. Yes. Yes.</p> <p>19 Q. And is that an image from the beginning of</p> <p>20 "Scientific Proof"?</p> <p>21 A. That's correct.</p> <p>22 Q. And the subtitle is "Internationally renowned</p> <p>23 physicist absolutely proves 2020 election was biggest</p> <p>24 cyber crime in world history." Do you see that?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 254</p> <p>1 A. Huh?</p> <p>2 Q. Evidence from Dennis Montgomery?</p> <p>3 A. From Dennis and the -- and the evidence that</p> <p>4 come from Dr. Frank and many, many other people.</p> <p>5 Q. Okay.</p> <p>6 A. So the -- we had the evidence. So I'm not</p> <p>7 going to back down just because of lawfare because you</p> <p>8 sue some -- what Fox News said.</p> <p>9 Q. And you understood at the time that you put out</p> <p>10 "Absolute Proof" and "Absolute Interference" and</p> <p>11 "Scientific Proof" that Smartmatic was a company that</p> <p>12 had business and employees that could be hurt by the</p> <p>13 statements you made about the company?</p> <p>14 A. No. Smartmatic was overseas. There's an</p> <p>15 article in 2008. They're overseas. They're -- it's</p> <p>16 very corrupt. This article -- and I've seen so many</p> <p>17 articles about this, it was like -- I don't know. I'm</p> <p>18 sure there are employees that aren't to blame for what</p> <p>19 their executives do. I don't know. It doesn't</p> <p>20 mean that -- just because they have employees that they</p> <p>21 do something really horrible does -- and their bosses</p> <p>22 do, you know --</p> <p>23 (Phone ringing.)</p> <p>24 A. Sorry -- sorry they work for them.</p> <p>25 MS. WRIGLEY: Let's go off the record for a</p>	<p style="text-align: right;">Page 256</p> <p>1 Q. And this was produced, again, by yourself,</p> <p>2 Brannon Howse and Mary Fanning?</p> <p>3 A. Correct.</p> <p>4 Q. And Brannon Howse directed this?</p> <p>5 A. Yeah, I guess directed it.</p> <p>6 Q. And the renowned physicist, that's Dr. Douglas</p> <p>7 Frank, correct?</p> <p>8 A. That's correct.</p> <p>9 Q. So if you look at the screenshot B, do you</p> <p>10 recognize that image --</p> <p>11 A. Yes, that's Dr. Frank.</p> <p>12 Q. -- from "Scientific Proof"?</p> <p>13 A. Yeah.</p> <p>14 Q. And is that Dr. Frank when he appeared on --</p> <p>15 A. Yes.</p> <p>16 Q. -- "Scientific Proof"?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. And I want to show you a couple clips</p> <p>19 from "Scientific Proof," just like you did with the</p> <p>20 other one. I'm going to mark one 608, 609 and 610. We</p> <p>21 have three clips. Again, they're not the entire</p> <p>22 "Scientific Proof," just a few clips, and then I'll ask</p> <p>23 you some questions.</p> <p>24 A. Okay.</p> <p>25 MR. KACHOUROFF: Can I interrupt?</p>

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<p style="text-align: right;">Page 257</p> <p>1 MS. WRIGLEY: Yes.</p> <p>2 MR. KACHOUROFF: Tell me the numbers of</p> <p>3 each one, if you know.</p> <p>4 MS. WRIGLEY: Yes. 608, 609 and 610.</p> <p>5 MR. KACHOUROFF: Thank you.</p> <p>6 (Clip from "Scientific Proof.")</p> <p>7 MR. LINDELL: So this is amazing. I just</p> <p>8 want everyone to know that and why we're showing it. It</p> <p>9 was every state. It happened in your state, it happened</p> <p>10 in your state, it happened in your state.</p> <p>11 Texas, when they said, oh, we didn't use</p> <p>12 the Dominion machine, huh, it doesn't matter. The name</p> <p>13 of the machine doesn't matter. Smartmatic, ES&S, it</p> <p>14 don't matter.</p> <p>15 (Clip ends.)</p> <p>16 Q. (BY MS. WRIGLEY) We're going to watch the</p> <p>17 second clip. This is 609.</p> <p>18 (Clip from "Scientific Proof.")</p> <p>19 MR. LINDELL: But then everywhere, it's --</p> <p>20 it's impossible. A hundred percent, it can only be done</p> <p>21 by machines. I can't stress that enough.</p> <p>22 MALE VOICE: Absolutely.</p> <p>23 MR. LINDELL: And they all rhyme with</p> <p>24 Dominion, they rhyme with Smartmatic, ES&S, all of them,</p> <p>25 you know, all of these, and it's just a -- it's</p>	<p style="text-align: right;">Page 259</p> <p>1 which you probably haven't heard about it. It's called</p> <p>2 Frank. You'll be able to use free speech again.</p> <p>3 Right now, what Dominion did, what they've</p> <p>4 done is like I've said before at MyPillow, if somebody</p> <p>5 is out there saying, Mike, there's rocks and knives in</p> <p>6 MyPillow's, I would say no, there's not. Come and look.</p> <p>7 Look at this. That's beautiful patented fill.</p> <p>8 Well, Dominion and Smartmatic, the machine</p> <p>9 people, they didn't do that. They said you're not</p> <p>10 looking at our machines. We're going to sue you and</p> <p>11 scare you all, live in fear, and we're going to -- or</p> <p>12 we're going to threaten you with...</p> <p>13 (Clip ends.)</p> <p>14 Q. (BY MS. WRIGLEY) Now, looking at those three</p> <p>15 clips from "Scientific Proof," did you recognize</p> <p>16 yourself?</p> <p>17 A. Yes.</p> <p>18 Q. And you appeared on "Scientific Proof" with --</p> <p>19 A. Yes.</p> <p>20 Q. -- Dr. Frank, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And in each of those clips, you identified</p> <p>23 Smartmatic as being part of election fraud, correct?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Now, the data that Dr. Frank presented, what</p>
<p style="text-align: right;">Page 258</p> <p>1 just a -- you know, I sit here and looked at...</p> <p>2 (Clip ends.)</p> <p>3 Q. (BY MS. WRIGLEY) The next one is 610.</p> <p>4 (Clip from "Scientific Proof.")</p> <p>5 MR. LINDELL: It's over. It would be over.</p> <p>6 You will never, ever have this opportunity again to</p> <p>7 go -- this was the big elephant. This was it.</p> <p>8 DR. FRANK: Yes.</p> <p>9 MR. LINDELL: This was the monster --</p> <p>10 MALE VOICE: Yes.</p> <p>11 DR. FRANK: -- that started in Venezuela</p> <p>12 and in foreign -- the foreign interference, the foreign</p> <p>13 attack on our country and every other country in the</p> <p>14 world that's going to be attacked after us --</p> <p>15 DR. FRANK: Right.</p> <p>16 MR. LINDELL: -- and with these machines</p> <p>17 and with these algorithms and with this technology that</p> <p>18 they have.</p> <p>19 And so it's a blessing. We're living in</p> <p>20 this time, and it's -- and besides that, everyone out</p> <p>21 there -- I have Democrat friends of mine are going this</p> <p>22 is not what we voted for. We didn't vote for socialism</p> <p>23 by communism, coming into this country and cancelling</p> <p>24 people out, taking away our First Amendment right of</p> <p>25 free speech, which we're going with our new platform</p>	<p style="text-align: right;">Page 260</p> <p>1 type of data was Mr. -- Dr. Frank disseminating?</p> <p>2 A. Here -- I'm going to go slow on this. Here's</p> <p>3 what Dr. Frank did. As you might know, I got voter</p> <p>4 rolls from every single state in the country. Some of</p> <p>5 them I had to pay a lot of money for, like Alabama,</p> <p>6 \$40,000.</p> <p>7 You take the voter rolls -- and this is in</p> <p>8 every county now. So let's take a county. Let's take</p> <p>9 LA County. You can take LA County and pick an age.</p> <p>10 Let's say you pick 32. The same percentage of</p> <p>11 32-year-olds voted in LA County that voted in every</p> <p>12 other county in California. These are mathematical</p> <p>13 impossibilities. It's a hundred percent impossible.</p> <p>14 And they used -- according to him, he was</p> <p>15 teaching -- he happened to be teaching two years prior</p> <p>16 in his physicist class, algorithms and mathematics.</p> <p>17 He's a genius. He's got 196 IQ or something.</p> <p>18 And he remembered, when he started looking</p> <p>19 at these, the 2010 census report, that pattern you see</p> <p>20 up there. So these things that are programmed, what he</p> <p>21 had, his data that comes right from out of the machine.</p> <p>22 These are data that you guys put out, that they put out,</p> <p>23 and you can go to every county and show a computer</p> <p>24 algorithm was used in that election.</p> <p>25 You can't -- any other election, you can't</p>

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<p style="text-align: right;">Page 261</p> <p>1 go -- let's see. Harvard County, 4 percent of 2 26-year-old votes -- voted. You can't go to every other 3 county in Minnesota and say it's 4 percent in every 4 county. It's all over the board. But this election in 5 2020, you could exactly. 6 So when he did that, that was just one 7 other footprint that matched what we already had, what 8 Dennis Montgomery said that it was computer manipulated. 9 Then we actually had a third one, which was 10 the cast vote records, which under the Freedom of 11 Information Act, that's the only thing we can get. 12 THE COURT REPORTER: Please slow down. 13 Q. (BY MS. WRIGLEY) Mr. Lindell, so Dr. Frank 14 examined census data for voters? 15 A. No. No. No. No. The census data was from 16 2010. He was teaching a class, and he remembered a 17 pattern. That pattern you see there, that pattern, when 18 it flips here, that was from like the night he explained 19 that little (gesturing) there is the Baby Boomers when 20 they came back from the war. That's the census pattern 21 of the United States in 2010. 22 But they used that because it's the last 23 census they had when they did the algorithms for the 24 2020 election. So your Smartmatic in LA County matches 25 Dominion's in Mesa County. These images are identical.</p>	<p style="text-align: right;">Page 263</p> <p>1 Q. Okay. 2 A. He had already started this -- 3 Q. And you said he's a mathematical genius, 4 correct? 5 A. He's a -- yeah. 196 IQ. 6 Q. And he's a professor of mathematics? 7 A. He's a physicist. He invented stuff for our -- 8 for our country. That's like a Nobel Prize. He's 9 invented stuff. It's like -- I mean... 10 Q. And where does he teach at, sir? 11 A. What's that? 12 Q. Where does he teach at? 13 A. He -- in Ohio. He's from Ohio, I believe. 14 Q. Okay. And is there any way for you to verify 15 the mathematics that Dr. Frank was doing -- 16 (Crosstalk.) 17 A. That was -- that was the -- 18 Q. (BY MS. WRIGLEY) You need to stop -- 19 A. Yeah. 20 Q. -- for -- 21 THE COURT REPORTER: Please let her finish. 22 THE WITNESS: Okay. 23 A. That was the easiest things to verify. That 24 was the easiest because I did it in my county. You 25 just -- what's the percentage of -- in my own county,</p>
<p style="text-align: right;">Page 262</p> <p>1 It's impossible. You can't -- 2 Q. And from your -- Mr. Lindell. I'm sorry. 3 Images of what exactly? What are we looking at? 4 A. This is the voter -- these are the -- with his 5 thing, it's specific. Yours -- I was telling you about 6 cast vote records, but they -- but Dr. Frank's image 7 exactly -- pick a state. If you want to pick California 8 because that's where you're in. In California, pick any 9 county. Pick any county. I will say Shasta County. 10 Shasta County, you could pick an age. Let's say 56. 11 You can look at the percentage of 56-year-olds that 12 voted in Shasta County, and every other county in 13 California, the same percentage of 56-year-olds voted in 14 every county. Never happened in any other election in 15 history. 16 Q. And so Dr. Frank is looking at the percentage 17 of voters for every age group in every county of 18 the entire -- 19 (Crosstalk.) 20 A. Of every county in the United States, which we 21 had to get from the counties. I had to pay for a lot of 22 the voter rolls, correct. 23 Q. And this is information that Dr. Frank brought 24 to you? 25 A. Yeah. The first time I met him.</p>	<p style="text-align: right;">Page 264</p> <p>1 Harbor, Minnesota, I picked an age 27. It's like 2 14 percent or whatever it was. 3 I took that -- because I'm mathematics. 4 That's what I do. So I looked at that. I go just pick 5 like Chaska County. (Oral noise.) They match. I'm 6 going (gesturing). I could pick any state. No, every 7 state was -- was different. Use whatever county you 8 started with. 9 Like here in Texas, I could take Angelina 10 County in the 2020 election, not another election, and 11 pick an age, and then -- and I did it. I did it in 12 probably 30 different ones. I said, okay, I'm 13 convinced. 14 But when he did this -- the day he did 15 this, I'm going, wow. Because all it did was validate 16 Dennis Montgomery's evidence that there was computer 17 manipulation and the lies of the machine companies that 18 say they're not online, you know. 19 Q. And I'm sorry, Mr. Lindell, I guess I'm not 20 following. Is he saying that in every single county in 21 every single state in the United States, there was a 22 percentage applied to adjust the votes in the 2020 23 election? 24 A. And using -- using -- with computers using the 25 2010 census.</p>

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<p style="text-align: right;">Page 265</p> <p>1 Q. And does Douglas Frank have any information 2 about computers being used with respect to these votes 3 getting cast? 4 A. Yeah. He would -- he would -- he's been 5 going -- he's been to -- I would say he's done 1,600 6 appearances now in every state in the country since 7 this. Yeah, that's all he does is go around trying to 8 save our country, talking to election officials, both 9 Democrats and Republicans, showing them what happened in 10 our elections. 11 Q. Mr. Lindell, I'm not sure if you heard my 12 question. I'm trying to get a sense of what exactly is 13 the information that Dr. Frank has? 14 He just knows percentage of voters based on 15 age groups -- 16 A. No, it's -- 17 Q. -- from the census data? 18 A. It's like this -- not the census data. That's 19 where they -- that they used to set the -- if you set a 20 computer -- okay, here would be an example, to give an 21 example, I'm going to use Carver County, my home county. 22 If I -- when you skim a casino -- okay. When you -- 23 because I don't know if you guys are around casinos. 24 Back in the Mafia days -- 25 Q. I don't skim casinos, sir.</p>	<p style="text-align: right;">Page 267</p> <p>1 So here's what they did. With his data, 2 you get it right from the registration, the voter rolls, 3 this is the age group in every county that voted. So if 4 you take Carver County, and if I said, you know what? 5 Wow, I looked -- if I looked into it and it said 6 everyone that voted in Carver County was 30 years old, 7 it was 90 percent 30-year-olds. But that wouldn't make 8 sense. That'd be a deviation. 9 So they had to use something as a base, and 10 it's just mathematics. They just put a program in there 11 and you're pulling names from the dirty voter rolls we 12 have in this country. Like Wisconsin is 7,100,000 13 people on their rolls. Well, if every person voted in 14 Wisconsin that could vote, it's 4,200,000. 15 THE COURT REPORTER: Could you please slow 16 down? 17 Q. (BY MS. WRIGLEY) Yes. 18 MS. WRIGLEY: And, Mr. Lindell, I'm just 19 going to strike that as nonresponsive. 20 A. So I'm just getting to the answer so -- to 21 explain it -- okay. To -- okay. Go ahead. 22 To explain it, if -- with Frank's stuff, 23 you take -- you pick a county, and you can pick an age, 24 and you pick an age, 42. You can predict the whole 25 other -- every single other county. You could never do</p>
<p style="text-align: right;">Page 266</p> <p>1 A. Okay. But when you skim a casino -- and when 2 the Mafia skimmed a casino, you can't take it from just 3 one machine or one -- or the craps table or even the 4 food. You have to bring it all down or it'll stand out. 5 It's called a deviation. It'll stand out like a sore 6 thumb. 7 This machine here took in -- made this much 8 more money or it took in this. It's all relevant. 9 MR. KACHOUROFF: Slow down, Mike. Slow 10 down for her. 11 THE WITNESS: Okay. 12 A. It's all relevant. Everything's relevant. So 13 you have to -- it's called the skim. You have to skim 14 everywhere. If -- if they were going to cheat an 15 election and you took a county, let's say Carver County, 16 and you said, okay, we're going to take -- we're going 17 to have Donald Trump win 100,000 to Biden's 5 votes. 18 Everybody would say, um, that's a computer error. We 19 wouldn't even question that. 20 Or like in the 2022 election, this Democrat 21 friend of mine, she got zero votes in her own precinct 22 that her and her husband live in. That was a little bit 23 of a deviation. Okay. 24 Q. Mr. Lindell -- 25 A. So let me finish.</p>	<p style="text-align: right;">Page 268</p> <p>1 that. That's mathematically impossible. It's like when 2 people -- it's just like that lady got zero votes in her 3 home precinct. 4 Then you say that's a deviation. Let's 5 find out why that happened. Let's find out how this 6 could happen. Because it had to -- it -- there's only 7 one answer. It was computer generated. 8 Q. (BY MS. WRIGLEY) And so, Mr. Lindell, let me 9 just -- I just want to understand what you're saying 10 Dr. Frank's -- 11 A. Uh-huh. 12 Q. -- evidence represents here. 13 Based on Dr. Frank's information that he 14 provided, all those voting machine companies would have 15 to be working together to execute this across every 16 county in every state, correct? I just want a simple 17 yes or no. 18 A. Not necessarily working together, but they 19 definitely are all connected by the Internet. 20 Q. Okay. So who's in charge of this conspiracy? 21 A. Who what? 22 Q. Who's in charge? Who's at the very top heading 23 up this conspiracy -- 24 A. You -- 25 Q. -- to use the voting machines --</p>

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<p style="text-align: right;">Page 269</p> <p>1 A. You don't want to find --</p> <p>2 Q. -- to change all these percentages across the</p> <p>3 entire company? I want to know who's at the top of this</p> <p>4 conspiracy in your mind, sir?</p> <p>5 A. Okay. I'm going to be very subjective on this</p> <p>6 because I don't know all their names. I would say the</p> <p>7 CCP, the globalists, the deep state and the uniparty.</p> <p>8 Those four.</p> <p>9 If I had to guess who came in, based on</p> <p>10 what I know now, because my biggest pushback, bar none,</p> <p>11 my biggest fight to get to paper ballots is only one</p> <p>12 kind of person, uniparty Republicans. Brad</p> <p>13 Raffensperger down in Georgia; Robin Vos in Wisconsin;</p> <p>14 all of South Dakota. I mean, I can't -- Alabama.</p> <p>15 I'll give you an example. I went to John</p> <p>16 Merrill, the Secretary of State of Alabama. I thought</p> <p>17 it would be easy. Let's go into these red states to get</p> <p>18 readings. But the Democrats wanted these machines gone</p> <p>19 long before the Republicans.</p> <p>20 I met with John Merrill, the Secretary of</p> <p>21 State of Alabama, and said, John, look at your voter</p> <p>22 rolls. Okay. Look at your voter rolls. I said, it</p> <p>23 says on here -- this came right from John -- 4,660</p> <p>24 people voted in Alabama in the 2020 election that were</p> <p>25 over 110 years old.</p>	<p style="text-align: right;">Page 271</p> <p>1 The machine companies covered it up. So -- I bet she's</p> <p>2 sitting on it right now, unless you get rid of them now</p> <p>3 in Georgia. I'm sure you know all about that case.</p> <p>4 Q. Mr. Lindell, I'm going to hand to you</p> <p>5 Exhibit 617, sir.</p> <p>6 (Exhibit 617 marked.)</p> <p>7 Q. (BY MS. WRIGLEY) For the record, this was</p> <p>8 marked as Exhibit 8 to the complaint. It's screenshots</p> <p>9 from Absolute 9.0.</p> <p>10 Can I have you turn to the second page,</p> <p>11 sir, screenshot A. Do you recognize this as an image</p> <p>12 from a documentary you put out, Absolute 9-0?</p> <p>13 A. Yeah. I don't know if you call it a</p> <p>14 documentary. It was just a one-hour show, a film from</p> <p>15 the chair.</p> <p>16 Q. Did you release a film called Absolute 9-0?</p> <p>17 A. Yeah. Yeah. Yes.</p> <p>18 Q. Okay. And when did you release that, sir?</p> <p>19 A. June of '21.</p> <p>20 Q. Okay. And this screenshot has pictures of</p> <p>21 Supreme Court Justices, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And 9-0 refers to the entire Supreme Court</p> <p>24 pulling the election down because they make a decision</p> <p>25 that it had been interfered with, correct?</p>
<p style="text-align: right;">Page 270</p> <p>1 And John looked at me and he said, well,</p> <p>2 Mike, we live pretty good here in Alabama. That was his</p> <p>3 comment, and it's disgusting. I get blocked by these</p> <p>4 uniparty Republicans.</p> <p>5 Q. So my --</p> <p>6 A. Now, do they have another agenda? Absolutely.</p> <p>7 Q. Would the secretaries of state have to be</p> <p>8 involved in this CCP conspiracy, sir?</p> <p>9 A. A lot of the secretary of states are. And why</p> <p>10 do I say that? I can say that with experience because</p> <p>11 it's a deviation when you get crooks like Brad</p> <p>12 Raffensperger down in Georgia who blocked the Curling</p> <p>13 case for three and a half years.</p> <p>14 That judge just this last fall, an</p> <p>15 Obama-appointed judge, said, hey, these experts --</p> <p>16 Halderman looked inside the machines and he said -- and</p> <p>17 they -- she said, you know what? They say there's</p> <p>18 problems, we're going to look at it. So -- and she said</p> <p>19 if you question the machines, you're not a conspiracy</p> <p>20 theorist. I took off my tin foil hat on national TV.</p> <p>21 Then on January 9th, that went to court, of</p> <p>22 this year. And Alex Halderman, a ball -- he's a</p> <p>23 Democrat. With a ballpoint pen, hacked into the machine</p> <p>24 and flipped the election right in front of the judge.</p> <p>25 Now, did it get national exposure? No.</p>	<p style="text-align: right;">Page 272</p> <p>1 A. Yes. That China interfered in our election,</p> <p>2 right.</p> <p>3 Q. Okay. Now, that never happened, right?</p> <p>4 A. What?</p> <p>5 Q. The Supreme Court never made such a decision?</p> <p>6 A. The case finally got -- maybe you don't know</p> <p>7 this. About a month ago, and they turned it down.</p> <p>8 Q. So there is no decision with 9 --</p> <p>9 A. It's not there yet.</p> <p>10 Q. -- of the Supreme Court Justices --</p> <p>11 A. It's not there yet.</p> <p>12 Q. Sir, we're going to have do a little bit better</p> <p>13 here.</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. There's no decision by the Supreme Court</p> <p>16 finding that the election from 2020 had been interfered</p> <p>17 with, correct?</p> <p>18 A. Right. As of right now, correct.</p> <p>19 Q. As of right now.</p> <p>20 Do you intend for the Supreme Court to</p> <p>21 overturn the 2020 election, sir?</p> <p>22 A. No. No. I intend for the Supreme Court to</p> <p>23 outlaw machines and go to paper ballots hand counted and</p> <p>24 protect our country. They deemed our elections critical</p> <p>25 infrastructure. That's the most critical infrastructure</p>

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<p style="text-align: right;">Page 273</p> <p>1 we have. And machines and computers cannot be used.</p> <p>2 Q. Now, Mr. Lindell, in connection with Absolutely</p> <p>3 9-0, did you intend for Smartmatic to be named as a part</p> <p>4 of an election fraud conspiracy in this movie?</p> <p>5 A. No. It was that the -- China attacked us and</p> <p>6 they had to -- this is my example. That China hacked</p> <p>7 into our country.</p> <p>8 MR. KACHOUROFF: Objection to form.</p> <p>9 A. That China hacked in, and that they would see</p> <p>10 that the -- our computers have got to go, and it would</p> <p>11 be Absolutely 9-0.</p> <p>12 Q. (BY MS. WRIGLEY) Who appeared in Absolutely</p> <p>13 9-0 with you, sir?</p> <p>14 A. Just me. Well, there was a -- an expert in</p> <p>15 there that was -- that was Conan Hayes, I believe. I</p> <p>16 believe the one that's smeared -- that's smeared out.</p> <p>17 Q. I'm going to show you a couple of video clips</p> <p>18 from -- actually, one video clip from Absolute 9-0.</p> <p>19 It's about a minute long. This is going to be marked as</p> <p>20 618.</p> <p>21 (Exhibit 618 marked.)</p> <p>22 Q. (BY MS. WRIGLEY) My colleague will come around</p> <p>23 and play it, and then I'll ask you a couple questions</p> <p>24 about it.</p> <p>25 MR. KACHOUROFF: Thank you.</p>	<p style="text-align: right;">Page 275</p> <p>1 Q. Okay. And you identified Smartmatic as being</p> <p>2 part of the election fraud?</p> <p>3 A. Uh-huh.</p> <p>4 Q. And you noted that Smartmatic machines were</p> <p>5 part of a cyber attack?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Now, at this point in June 2021, you had done</p> <p>8 four different documentaries or movies about election</p> <p>9 fraud in the 2020 election, correct?</p> <p>10 A. That's correct.</p> <p>11 Q. In all four of those, Smartmatic was identified</p> <p>12 as being involved, correct?</p> <p>13 A. That's correct.</p> <p>14 Q. And you intended for Smartmatic to be named in</p> <p>15 those movies, correct?</p> <p>16 A. I named them, so if -- if it came out of my</p> <p>17 mouth as one of the machine companies.</p> <p>18 Q. Now, in August of 2021, you had a three-day</p> <p>19 Cyber Symposium in South Dakota, correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And the -- that was an event to, again, talk</p> <p>22 about election fraud in the 2020 election, correct?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Smartmatic was again named in the Cyber</p> <p>25 Symposium, right?</p>
<p style="text-align: right;">Page 274</p> <p>1 (Clip from Absolute 9-0.)</p> <p>2 MR. LINDELL: Hello, everyone. I'm Mike</p> <p>3 Lindell. And as you all know, on January 9th, I</p> <p>4 received evidence of a cyber attack orchestrated by</p> <p>5 China on our 2020 election. I took that one piece of</p> <p>6 evidence and I just went all in. This was something</p> <p>7 different nobody had seen. This was something that came</p> <p>8 through the machines, the Dominion machines, the</p> <p>9 Smartmatic, and other machines. This was a cyber</p> <p>10 attack. I didn't know anything about cyber attacks, and</p> <p>11 what I learned, I had to learn real fast, and I hired</p> <p>12 experts to validate this. I hired -- these guys are</p> <p>13 White Hat hackers that work for the government.</p> <p>14 But what I'm going to show you tonight is</p> <p>15 you're going to all know now why I have been 100 percent</p> <p>16 sure that when this gets before the Supreme Court, it's</p> <p>17 going to be 9-0. 9-0 to pull this election down, and</p> <p>18 that this was a hundred percent attack by China on our</p> <p>19 country through these machines.</p> <p>20 (Clip ends.)</p> <p>21 Q. (BY MS. WRIGLEY) Do you recognize yourself</p> <p>22 in --</p> <p>23 A. Yes.</p> <p>24 Q. And that was from Absolute 9-0, correct?</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 276</p> <p>1 A. I don't know. I imagine they were.</p> <p>2 Q. I'm going to hand to you 619.</p> <p>3 (Exhibit 619 marked.)</p> <p>4 Q. (BY MS. WRIGLEY) This is a printout from</p> <p>5 FrankSpeech. Do you recognize this as something put up</p> <p>6 on FrankSpeech --</p> <p>7 A. Yeah.</p> <p>8 Q. -- advertising the Cyber Symposium?</p> <p>9 A. That's correct.</p> <p>10 Q. And did you advertise the Cyber Symposium on</p> <p>11 FrankSpeech.com?</p> <p>12 A. Yes.</p> <p>13 Q. And the event -- the Cyber Symposium from</p> <p>14 August 2, 2021 was actually live streamed for a few days</p> <p>15 on FrankSpeech.com, correct?</p> <p>16 A. All three days.</p> <p>17 Q. Okay. And do you know how many people watched</p> <p>18 during that live stream of the three days, sir?</p> <p>19 A. No idea.</p> <p>20 Q. Do you have records that would show the number</p> <p>21 of people that streamed the Cyber Symposium --</p> <p>22 A. Wouldn't have a clue.</p> <p>23 Q. -- on FrankSpeech.com?</p> <p>24 A. Wouldn't have a clue.</p> <p>25 Q. Would there be records connected with the</p>

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<p style="text-align: right;">Page 277</p> <p>1 organization FrankSpeech.com --</p> <p>2 A. No.</p> <p>3 Q. -- that would show that?</p> <p>4 A. No. It was a website back then.</p> <p>5 Q. As you sit here today, how many people do you</p> <p>6 think watched the Cyber Symposium?</p> <p>7 A. Did you watch it?</p> <p>8 Q. I've seen it, yes, sir.</p> <p>9 A. Then we know there's two.</p> <p>10 Q. Yes.</p> <p>11 A. I have no clue. I know a lot of people tuned</p> <p>12 in because they broke the stream right away. Once</p> <p>13 again, just kind of the same problem we had when we</p> <p>14 originally aired "Absolute Proof." They kept breaking</p> <p>15 the stream.</p> <p>16 Q. Okay. Now --</p> <p>17 A. I will say this, you say advertised on</p> <p>18 FrankSpeech.com, I advertised everywhere in the country,</p> <p>19 ABC, NBC, everywhere, and it was kind of interesting, on</p> <p>20 the first day of the Cyber Symposium, FOX -- or NewsMax</p> <p>21 and -- what was the other -- and I think OAN, those two</p> <p>22 were sued the first day for airing that advertising, and</p> <p>23 not one of -- the other stations weren't sued, CNN, NBC,</p> <p>24 that ran those ads. It's kind of strange.</p> <p>25 Q. Now, if I look at Exhibit 619, sir, do you see</p>	<p style="text-align: right;">Page 279</p> <p>1 Q. And then the FLS, that code refers to --</p> <p>2 A. I have no idea what that code refers to. I</p> <p>3 didn't put that there. That's not me putting that</p> <p>4 there. That was probably Brannon Howse, who was running</p> <p>5 FrankSpeech at the time. MyPillow was paying for</p> <p>6 advertisement.</p> <p>7 Q. Okay.</p> <p>8 A. So I don't know what FL is. Frank -- I have no</p> <p>9 idea what that stands for.</p> <p>10 Q. Okay. I'm going to show you a video clip of</p> <p>11 the Cyber Symposium, just a few minutes, not the whole</p> <p>12 thing, obviously --</p> <p>13 A. Uh-huh.</p> <p>14 Q. -- then ask you some questions about it.</p> <p>15 MS. WRIGLEY: This is going to be</p> <p>16 Exhibit 620.</p> <p>17 (Exhibit 620 marked.)</p> <p>18 (Clip from Cyber Symposium.)</p> <p>19 MR. LINDELL: I'm just doing every day what</p> <p>20 I believe God's telling me I should do when I pray.</p> <p>21 That's it. And -- and I will say, though, we have a</p> <p>22 bigger chance of whatever we're doing by every state</p> <p>23 that you go in and, you know, these machines, these</p> <p>24 computer got to go, because it only takes one attack</p> <p>25 there. You could get attacked on a downslide. You</p>
<p style="text-align: right;">Page 278</p> <p>1 at the very bottom on the first page it says, "Check out</p> <p>2 For Liberty's Sake on FrankSpeech. Save on MyPillow</p> <p>3 products using promo code FLS." Do you see that?</p> <p>4 A. Uh-huh.</p> <p>5 Q. And was there a promo code for the sale of</p> <p>6 MyPillow products used in connection with the Cyber</p> <p>7 Symposium?</p> <p>8 A. No. At the Cyber Symposium, I ran it</p> <p>9 commercial-free almost the whole time -- the whole time.</p> <p>10 There was no commercials. It was not to make money. I</p> <p>11 lost a lot of money, millions of dollars.</p> <p>12 Q. Now, do you see at the bottom here it mentions</p> <p>13 FLS as a promo code?</p> <p>14 A. On this, but I don't know what this is.</p> <p>15 Q. At the bottom sentence on the first page.</p> <p>16 A. I don't know what this was.</p> <p>17 Q. This was printed out from FrankSpeech.com. It</p> <p>18 was a promotion for the Cyber Symposium on the website,</p> <p>19 sir.</p> <p>20 A. Okay. Print. So it was on FrankSpeech.com?</p> <p>21 Q. Indeed, yes.</p> <p>22 A. So we had ads up there all the time. That's a</p> <p>23 thing at the bottom of all the FrankSpeech stuff to this</p> <p>24 day. MyPillow's an advertiser on FrankSpeech. There</p> <p>25 are different owners, you know.</p>	<p style="text-align: right;">Page 280</p> <p>1 could have another attack over here with our -- all our</p> <p>2 credit cards. You could have big companies attack. You</p> <p>3 could have our meat -- you know, all -- anything attack.</p> <p>4 But if you attack an election, you've only</p> <p>5 got to get through once, and that's it. You control it</p> <p>6 forever. You control the country. And they'll put</p> <p>7 it there -- oh, they're bringing it back to Venezuela.</p> <p>8 Venezuela is where the machines started. Smartmatic</p> <p>9 started in Venezuela.</p> <p>10 I got a whole big -- I spent millions of</p> <p>11 dollars investigating this. They're built to take --</p> <p>12 they're built as a tool to take countries. If -- and</p> <p>13 why do you think -- you know, you had Eduardo here from</p> <p>14 Brazil. The same thing. It's an identical mirror to</p> <p>15 what happened here.</p> <p>16 (Clip ends.)</p> <p>17 Q. (BY MS. WRIGLEY) Do you recognize that --</p> <p>18 A. Uh-huh.</p> <p>19 Q. -- as an appearance or a discussion you had at</p> <p>20 the Cyber Symposium in August 2021?</p> <p>21 A. That's correct.</p> <p>22 Q. And you identified Smartmatic, sir?</p> <p>23 A. Uh-huh.</p> <p>24 Q. And you identified Smartmatic machines as being</p> <p>25 tools built to control elections?</p>

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<p style="text-align: right;">Page 281</p> <p>1 A. Uh-huh.</p> <p>2 Q. And at this point in August 2021, you were</p> <p>3 telling people that Smartmatic machines were being used</p> <p>4 to commit election fraud, correct?</p> <p>5 A. All machines. I didn't -- I wasn't prejudiced</p> <p>6 against Smartmatic. Let's be clear.</p> <p>7 Q. But you did make sure to mention Smartmatic --</p> <p>8 A. Yeah. Smartmatic, ES&S, Hart and Dominion.</p> <p>9 Q. And you made sure to mention Venezuela,</p> <p>10 correct?</p> <p>11 A. Venezuela, because that investigation was</p> <p>12 already done by then. We had plenty of information on</p> <p>13 Smartmatic.</p> <p>14 Q. And in one of the prior videos, you actually</p> <p>15 mentioned there being a monster from Venezuela, meaning</p> <p>16 Smartmatic, correct?</p> <p>17 A. A what?</p> <p>18 Q. A monster.</p> <p>19 A. Monster what?</p> <p>20 Q. I believe in one of the earlier videos, sir,</p> <p>21 that we watched --</p> <p>22 A. I probably compared shade copies of monsters.</p> <p>23 So what?</p> <p>24 Q. You said, though, this was the monster that</p> <p>25 started in Venezuela. Do you remember that?</p>	<p style="text-align: right;">Page 283</p> <p>1 What I knew then -- by the time I knew, by</p> <p>2 the spring of 2021, this wasn't about the 2020 election.</p> <p>3 This is about all elections. This is about our</p> <p>4 freedoms. We have to get rid of these electronic</p> <p>5 machines.</p> <p>6 MS. WRIGLEY: Move to strike as</p> <p>7 nonresponsive to everything after "yes."</p> <p>8 MR. KACHOUROFF: I believe that it was</p> <p>9 responsive.</p> <p>10 Q. (BY MS. WRIGLEY) Now, you con --</p> <p>11 MR. KACHOUROFF: So I'm going to object to</p> <p>12 your objection.</p> <p>13 Q. (BY MS. WRIGLEY) You continued to speak</p> <p>14 publicly about Smartmatic being involved in election</p> <p>15 fraud after 2021 and continuing through the present,</p> <p>16 correct?</p> <p>17 A. No. I'd say all machines. I don't even bring</p> <p>18 up the brands any more. It's -- I don't -- it doesn't</p> <p>19 matter because they're -- they switch different brands</p> <p>20 all the time.</p> <p>21 Q. Did you talk about Smartmatic in 2022 related</p> <p>22 to its machines being used to interfere with the 2020</p> <p>23 election?</p> <p>24 A. I don't know. You'd have to find some clips.</p> <p>25 Q. Okay. Did you post anything on FrankSpeech</p>
<p style="text-align: right;">Page 282</p> <p>1 A. It sounds good to me. Yes, I'll say it again.</p> <p>2 This is a monster. The machine companies that interfere</p> <p>3 in our elections, that's a monster, the whole thing.</p> <p>4 Q. Were you referring to Smartmatic as the</p> <p>5 monster, sir?</p> <p>6 A. Part of the monster, yes. Absolutely.</p> <p>7 Q. Now, at that point in August of 2021, you had</p> <p>8 been identifying Smartmatic as being involved in</p> <p>9 election fraud for the 2020 election since February of</p> <p>10 2021, correct?</p> <p>11 A. Yes. Yep.</p> <p>12 Q. For about --</p> <p>13 A. Yes.</p> <p>14 Q. -- over six months at that point?</p> <p>15 A. Yes.</p> <p>16 Q. And you intended to target Smartmatic as a</p> <p>17 participant in this crime to steal the election from</p> <p>18 Trump, correct?</p> <p>19 A. Yes. But at that point, it was -- it's -- at</p> <p>20 that point, there was a shift. It's like it didn't</p> <p>21 matter if -- just like this coming up election. It</p> <p>22 doesn't -- I would trade everything if we get rid of the</p> <p>23 machines, for everything. I don't care -- it doesn't</p> <p>24 matter who the president is or isn't. This isn't a</p> <p>25 Democrat or Republican thing.</p>	<p style="text-align: right;">Page 284</p> <p>1 about Smartmatic in 2022?</p> <p>2 A. Probably not. Probably it's all machines.</p> <p>3 It's all machines. It doesn't matter. We don't --</p> <p>4 every single voting machine company.</p> <p>5 Q. In 2022, did you post on social media about</p> <p>6 Smartmatic being involved in election fraud?</p> <p>7 A. I don't know.</p> <p>8 Q. How about on FrankSocial?</p> <p>9 A. I don't know.</p> <p>10 Q. How about on --</p> <p>11 A. Any information about the elections that we</p> <p>12 post, I don't think it's specific to Smartmatic.</p> <p>13 Smartmatic probably would have made my news when we got</p> <p>14 the cast vote records finally from LA County when we --</p> <p>15 that's right. When we did get -- when we did -- we did</p> <p>16 a whole -- I think we did a whole episode on Smartmatic</p> <p>17 once we got the cast vote records, which we waited. We</p> <p>18 had to pay \$5,000 for from LA County. We had -- they</p> <p>19 finally gave up the cast vote records. Once we had</p> <p>20 that, I believe we talked all about Smartmatic because</p> <p>21 then we had them dead to rights.</p> <p>22 Q. I mean, is it fair to say that you've been</p> <p>23 trying to talk to as many people as possible about</p> <p>24 Smartmatic machines being used to steal the 2020</p> <p>25 election?</p>

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<p style="text-align: right;">Page 285</p> <p>1 A. That's not -- that's not true at all. It's any 2 machine, any voting machine. You could talk to anybody 3 on the street. Any voting machine. The brand does not 4 matter. It's very similar to Kill Chain when all the 5 Democrats said, you know what? We've got to get rid of 6 these machine companies. 7 Q. I'm going to hand to you 621, sir. 8 (Exhibit 621 marked.) 9 Q. (BY MS. WRIGLEY) This is a document produced 10 DEF 026451. It's an event entry that was produced from 11 your E-mail account. 12 Do you see at the top where it says. 13 "Event accepted. Discussion with Brent from Canada re 14 Smartmatic"? 15 A. Uh-huh. 16 Q. Do you know who Brent from Canada is? 17 A. Yeah. He's a cyber -- he's an expert from 18 Canada. He's been involved for 30 years. Goes all the 19 way back to Toronto with Dominion, and he's probably 20 forgotten more about Smartmatic than most of us will 21 ever know. 22 Q. And what's Brent's last name, sir? 23 A. Brent -- can I look in my phone? I can tell 24 you. 25 Q. Well, if your attorney says it's okay. What's</p>	<p style="text-align: right;">Page 287</p> <p>1 Q. -- and then the end date is on that same date 2 for this event? 3 A. I see it. Yep. 4 Q. And do you see that the start and end date, 5 it's got like a two-hour span? 6 A. See that what? 7 Q. Do you see that? 8 A. Yeah. 9 Q. It's 16:30 to 18:30? 10 A. Okay. 11 Q. Okay. And have you had long calls with Brent 12 Beleskey to talk about Smartmatic? 13 A. No. 14 Q. Okay. Do you know if this conference call with 15 Brent Beleskey from Canada regarding Smartmatic took 16 place between you and himself? 17 A. What -- say that again. 18 Q. Do you -- 19 A. Is this a phone call? What is this? 20 Q. It's an entry for a conference call scheduled 21 on 11-23-2022. 22 A. That would be probably when I was introduced to 23 him. And he's -- you know, this guy knows everything 24 about the relationship between Smartmatic and Dominion. 25 I'm just assuming that's what it was.</p>
<p style="text-align: right;">Page 286</p> <p>1 his last name? 2 A. B-E-L-E-S-K-E-Y. 3 Q. And how did you get connected to Brent 4 Beleskey? 5 A. No idea. I became like a hub of a wheel. 6 Anybody that -- I believe one of our -- either one of 7 our lawyers reached out to him -- he was also an expert 8 in some Colorado cases that were going on against Janet 9 Griswold, the Secretary of State of Colorado, with 10 Dominion people. 11 Q. Now -- 12 A. He was referred to me as the expert of all 13 experts, and not just during the cyber part, but knowing 14 the relationship of Smartmatic where the genesis was, 15 where it all started. 16 This guy's like a walking encyclopedia when 17 it comes to Smartmatic. He knows the owners, the 18 owners, the -- the relationships between the companies. 19 Who did what, what day they did it, everything. He's -- 20 you guys should interview him sometime. He'd be -- he's 21 pretty amazing. 22 Q. Mr. Lindell, let me ask you, looking at this, 23 do you see that the start date is November 23rd, 2020 24 through -- 2022 -- 25 A. Uh-huh.</p>	<p style="text-align: right;">Page 288</p> <p>1 Q. Did you have a conference call with this Brent 2 from Canada regarding Smartmatic on November 23rd, 2022? 3 A. If this is correct, yes. If this is correct. 4 Q. Let me ask you this: Do you remember 5 participating in a conference call with Brent Beleskey 6 about Smartmatic? 7 A. I've talked to him many times, not specifically 8 about Smartmatic. About Dominion and Smartmatic and the 9 relationship of the two. 10 Q. When was -- 11 A. The genesis of the election stuff. Not ES&S. 12 He's more of an ex -- well, he's an expert there, too. 13 I think he's an expert in all relationships going back. 14 He's dedicated his whole life to trying to stop the 15 machines. He's from Canada. He knows a lot of stuff of 16 Dominion in Toronto. 17 Q. Where does he currently work? 18 A. When they first got -- that's what? 19 Q. Where does he work, Mr. Beleskey? 20 A. I have no idea. 21 Q. What's his background, sir? 22 A. He's -- I believe -- he might have even worked 23 for one of the machine companies. I don't know. You'd 24 have to check. I don't know right now. I'd have to... 25 Q. When was the last time you talked to</p>

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<p style="text-align: right;">Page 289</p> <p>1 Mr. Beleskey?</p> <p>2 A. I don't -- once in a while, he texts me. If</p> <p>3 he'll see something in the news, he'll send it to me, if</p> <p>4 it's relevant. Like Smartmatic getting sued or getting</p> <p>5 a lawsuit in Florida that's going on right now. I guess</p> <p>6 you guys are in big trouble. He text me that. I</p> <p>7 haven't had time to read it. But little things like</p> <p>8 that.</p> <p>9 He's up on everything you guys do. No, he</p> <p>10 is. I'm just saying. I'm just being honest. That's</p> <p>11 what he does. He doesn't look at the cyber side, he</p> <p>12 looks at the criminality side of what's going on</p> <p>13 criminally within the Smartmatic world.</p> <p>14 Q. Mr. Lindell, Joe Biden was elected president of</p> <p>15 the United States on January 6th, 2021, correct?</p> <p>16 A. No. Absolutely not. Hundred percent not.</p> <p>17 Q. And you called Trump the real president,</p> <p>18 correct?</p> <p>19 A. I do it every day.</p> <p>20 Q. And you do not believe that Joe Biden is the</p> <p>21 president of the United States?</p> <p>22 A. Hundred percent, no.</p> <p>23 Q. Now, January 6th was also the day of the</p> <p>24 Capitol riots, correct?</p> <p>25 A. Uh-huh. Yes.</p>	<p style="text-align: right;">Page 291</p> <p>1 my own due diligence at that time. But they're out</p> <p>2 there, everyone, okay. They're attacking me. Maybe not</p> <p>3 everyone. Obviously, everybody was against Trump, but</p> <p>4 they...</p> <p>5 Q. I'm going to hand you Exhibit 622, sir.</p> <p>6 (Exhibit 622 marked.)</p> <p>7 MR. KACHOUROFF: Running objection to all</p> <p>8 these statements about other people from the outside,</p> <p>9 and so the objection is to relevance.</p> <p>10 Was that slow enough?</p> <p>11 Q. (BY MS. WRIGLEY) Sir, this is a news article</p> <p>12 from the New York Times that was printed up. It was</p> <p>13 attached to --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- the complaint, Exhibit 101 --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- dated November 19, 2020, with the title "The</p> <p>18 Times called officials in every state. No evidence of</p> <p>19 voter fraud." Do you see that?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Do you see the subtitle is "The President and</p> <p>22 his allies have been" -- "have basically claimed that</p> <p>23 rampant voter fraud stole victory from him. Officials</p> <p>24 contacted by the Times said that there were no</p> <p>25 irregularities that affected the outcome"?</p>
<p style="text-align: right;">Page 290</p> <p>1 Q. Were you at the Capitol on January 6th, sir?</p> <p>2 A. No, I wasn't.</p> <p>3 Q. Were you aware before January 6th, a number of</p> <p>4 election fraud claims about voting machines had been</p> <p>5 made publicly by individuals such Sidney Powell and Rudy</p> <p>6 Giuliani in connection with the 2020 election?</p> <p>7 A. That they had -- that they were out there</p> <p>8 fighting for it? Absolutely. I heard all -- I watched</p> <p>9 many of the evidence things, like in Arizona where Rudy</p> <p>10 Giuliani presented all the evidence.</p> <p>11 Q. Their claims were publicly rejected or fact</p> <p>12 checked by a number of major news organizations prior to</p> <p>13 January 6th, 2021.</p> <p>14 A. Who's that? Who's that?</p> <p>15 MR. KACHOUROFF: Objection. He doesn't --</p> <p>16 A. CNN?</p> <p>17 MR. KACHOUROFF: Hang on. Mike, Mike,</p> <p>18 Mike.</p> <p>19 Objection. Is there a question?</p> <p>20 MS. WRIGLEY: Yes.</p> <p>21 Q. (BY MS. WRIGLEY) Were you aware of whether</p> <p>22 their claims were publicly rejected or fact checked by a</p> <p>23 number of major news organizations prior to January 6th,</p> <p>24 2021?</p> <p>25 A. No. I did my own due diligence. I was doing</p>	<p style="text-align: right;">Page 292</p> <p>1 A. Okay.</p> <p>2 MS. WRIGLEY: Do you have a question?</p> <p>3 MR. KACHOUROFF: I'm sorry. I didn't mean</p> <p>4 to interrupt. I was trying not to interrupt you. Is it</p> <p>5 622?</p> <p>6 MS. WRIGLEY: 622, yes.</p> <p>7 MR. KACHOUROFF: I'm sorry.</p> <p>8 MS. WRIGLEY: That's okay.</p> <p>9 Q. (BY MS. WRIGLEY) Do you see that subheading --</p> <p>10 A. Yeah.</p> <p>11 Q. -- Mr. Lindell?</p> <p>12 A. Yeah.</p> <p>13 Q. Are you familiar with this New York Times</p> <p>14 article, sir?</p> <p>15 A. No. I never read this article. And I'll make</p> <p>16 a statement there. All the stuff going out there, all</p> <p>17 the noise saying everything is a lie, that Donald Trump</p> <p>18 is lying and these -- Rudy Giuliani's wrong, who is</p> <p>19 America's mayor, Sidney Powell's wrong, all this -- I</p> <p>20 was busy doing my own due diligence. I do my own due</p> <p>21 diligence, like when I met Donald Trump, and people</p> <p>22 can't tell me, oh, he's this or this because I met him.</p> <p>23 I did my due diligence. I did my own due diligence.</p> <p>24 I was busy getting voter rolls from every</p> <p>25 state and finding out people voted that didn't live</p>

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<p style="text-align: right;">Page 293</p> <p>1 there. That's what I was doing.</p> <p>2 So when I see garbage like this saying</p> <p>3 there was no fraud, well, somebody voted that didn't</p> <p>4 live in that state. You can -- that's a fact, some --</p> <p>5 all these people -- the 4,600 people voted in Alabama</p> <p>6 that were over 110 years old. That's a fact that came</p> <p>7 right out of the machines.</p> <p>8 I found 22,000 people voted in Georgia that</p> <p>9 didn't live there. That's a fact. It came right out of</p> <p>10 the machine.</p> <p>11 So when you see this garbage, it's like</p> <p>12 every other news. Who wrote this? Where's his facts?</p> <p>13 Who -- what official said that? You'd be talking --</p> <p>14 like Bill Barr, here's another good one. Bill Barr says</p> <p>15 there wasn't enough to overturn the election. There</p> <p>16 wasn't enough to overturn the election, no fraud.</p> <p>17 Well, Bill Barr stopped officials in</p> <p>18 Pennsylvania from investigating the election. We</p> <p>19 have it -- I have the document that shows that.</p> <p>20 So all these things you say -- another one</p> <p>21 was Chris -- that we all heard, Chris Krebs when he said</p> <p>22 it's the most secure election ever. Do you know three</p> <p>23 months later, he said on Morning Joe on MSNBC with Adam</p> <p>24 Schiff -- he was asked, Chris, what's the most --</p> <p>25 biggest threat to the United States? You know what he</p>	<p style="text-align: right;">Page 295</p> <p>1 fraud in the 2020 election?</p> <p>2 A. Well, no. Election officials from where? Who</p> <p>3 is this article -- this Times?</p> <p>4 Q. Correct.</p> <p>5 A. I didn't sit there and read the Times. I was</p> <p>6 busy doing my own due diligence, 18 hours a day digging</p> <p>7 into it myself, out getting voter rolls in your state</p> <p>8 and doing my own investigation.</p> <p>9 I'm not going to trust -- oh, because some</p> <p>10 election official said it. There were too many</p> <p>11 deviations that happened. I look at deviations.</p> <p>12 On the night of -- on the morning of</p> <p>13 November 4th, in the middle of the night, when I seen</p> <p>14 106,000 votes come down for Biden and 3,000 for Donald</p> <p>15 Trump, they said it was the -- they said, oh -- if you</p> <p>16 listen closely here, they said, oh, those darn intercity</p> <p>17 mail-in votes. You know, there's only one problem with</p> <p>18 that, the mail-in votes in Michigan were counted on the</p> <p>19 morning of the 3rd, not in the middle of the night on</p> <p>20 the 4th. So where did they come from? I just had</p> <p>21 questions.</p> <p>22 Arizona had 80,000 votes less to count, 1</p> <p>23 percent of the vote, and it took them 10 days to count</p> <p>24 it. That, to me, was a deviation -- I -- there were</p> <p>25 problems. I wanted to get to the bottom of the</p>
<p style="text-align: right;">Page 294</p> <p>1 said? This is three months after the election. Bar</p> <p>2 none, a cyber attack from China right down to the local</p> <p>3 races, end quote.</p> <p>4 MS. WRIGLEY: I'm going to move to strike</p> <p>5 as nonresponsive.</p> <p>6 A. But end quote.</p> <p>7 Q. (BY MS. WRIGLEY) Sir, can I ask you --</p> <p>8 A. I mean, so you're bringing up stuff. No, I</p> <p>9 didn't read this. What are you telling me? Because</p> <p>10 other people -- I do my own due diligence, so it comes</p> <p>11 from the heart. Comes from my mind, my facts that I see</p> <p>12 in front of me.</p> <p>13 Q. Mr. Lindell, I'm going to ask you about the</p> <p>14 first paragraph. Can you read this with me, please,</p> <p>15 sir.</p> <p>16 First paragraph states, "Election officials</p> <p>17 in dozens of states representing both political parties</p> <p>18 said that there was no evidence that fraud or other</p> <p>19 irregularities played a role in the outcome of the</p> <p>20 presidential race, amounting to a forceful rebuke of</p> <p>21 President Trump's portrayal of a fraudulent election."</p> <p>22 Do you see that?</p> <p>23 A. Yeah.</p> <p>24 Q. Were you aware in November of 2020 that</p> <p>25 election officials were rejecting claims of election</p>	<p style="text-align: right;">Page 296</p> <p>1 deviation.</p> <p>2 I don't care what anyone writes. They</p> <p>3 didn't do the due diligence I did. I did more due</p> <p>4 diligence than anyone probably in the whole country, bar</p> <p>5 none.</p> <p>6 MS. WRIGLEY: Move to strike as</p> <p>7 nonresponsive.</p> <p>8 Q. (BY MS. WRIGLEY) I'm going to ask about</p> <p>9 another part, sir.</p> <p>10 A. Uh-huh.</p> <p>11 Q. Do you see here where it says, "Kansas did not</p> <p>12 experience any widespread, systemic issues with voter</p> <p>13 fraud, intimidation, irregularities or voting problems,</p> <p>14 a spokeswoman for Scott Schwab, the Republican Secretary</p> <p>15 of State in Kansas, said in an E-mail Tuesday. We are</p> <p>16 very pleased with how the election has gone up to this</p> <p>17 point." Do you see that?</p> <p>18 A. You know what I got from Kansas? I got from</p> <p>19 Kansas -- this -- from Kansas, videos. These are</p> <p>20 Democrats going into vote and their vote got switched to</p> <p>21 Republican. Video from a phone got switched to</p> <p>22 Repub- --</p> <p>23 Q. Mr. Lindell, you think that you know better</p> <p>24 about what happened in the election than the Secre --</p> <p>25 A. A hundred percent I do, because I did --</p>

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<p style="text-align: right;">Page 297</p> <p>1 Q. Hold on, sir.</p> <p>2 A. -- because I did due diligence.</p> <p>3 Q. You think you know better than the Secretary of</p> <p>4 State of Kansas in terms of what happened in the 2020</p> <p>5 presidential election?</p> <p>6 A. 100 percent, I do --</p> <p>7 Q. Okay.</p> <p>8 A. -- especially now.</p> <p>9 Q. And is that true for the Secretary of State of</p> <p>10 all 50 states, sir?</p> <p>11 A. Probably.</p> <p>12 Q. Okay. So you know better than Alaska, Alabama?</p> <p>13 A. Uh-huh. Yes.</p> <p>14 Q. Yes?</p> <p>15 A. Yes.</p> <p>16 Q. You know better than South Dakota?</p> <p>17 A. Because I've done -- I've spent probably --</p> <p>18 it's 18 hours a day times three years of my life every</p> <p>19 morning to get up to help save this country and get rid</p> <p>20 of your machine companies. Yes, I know all of it. You</p> <p>21 could combine them all, and I'd probably know more than</p> <p>22 all of them. And that's fact. I had to learn it. It's</p> <p>23 like going to school, and every day you learn more and</p> <p>24 more.</p> <p>25 If the election had been turned over to</p>	<p style="text-align: right;">Page 299</p> <p>1 the interviews that Christopher Krebs, who you've</p> <p>2 mentioned, did with 60 --</p> <p>3 A. I just mentioned it.</p> <p>4 Q. -- did with 60 Minutes in November of 2020.</p> <p>5 Now, sir, before I ask you about this</p> <p>6 document, you're familiar with Christopher Krebs,</p> <p>7 correct?</p> <p>8 A. Because of what he said, because of what he</p> <p>9 said on MSNBC, and because he got fired by CISA because</p> <p>10 of what he said back then, so...</p> <p>11 Q. Now, he was the director of the U.S. cyber</p> <p>12 agency responsible for making sure that there was</p> <p>13 integrity for the 2020 presidential election, correct?</p> <p>14 A. Uh-huh.</p> <p>15 Q. And you're laughing, but you're smirking at</p> <p>16 Mr. Krebs.</p> <p>17 A. Because he got fired in CISA. He got fired</p> <p>18 for -- for --</p> <p>19 Q. He got fired by a --</p> <p>20 A. -- he lied back then.</p> <p>21 THE COURT REPORTER: I'm sorry. I really</p> <p>22 can only take one at a time. I really can.</p> <p>23 THE WITNESS: Okay.</p> <p>24 A. But he lied back then.</p> <p>25 Q. (BY MS. WRIGLEY) Sir, I will try my best not</p>
<p style="text-align: right;">Page 298</p> <p>1 Donald Trump on December 14th of 2020, we would have</p> <p>2 lost our country forever, because so much has been</p> <p>3 revealed in the last three years about the machine</p> <p>4 companies, about what they're capable of, about what</p> <p>5 they can do, and we have to get rid of them or we lose</p> <p>6 our country forever. We lose our freedoms I grew up</p> <p>7 with. That's a fact.</p> <p>8 I will never stop. I will never back down.</p> <p>9 I'm sorry that you work for them. That's too bad. I</p> <p>10 can't back down on what I know. I know more than all of</p> <p>11 them put together.</p> <p>12 MS. WRIGLEY: I'm going to move to strike</p> <p>13 as nonresponsive.</p> <p>14 MR. KACHOUROFF: I think it is very</p> <p>15 responsive.</p> <p>16 A. Yeah. You asked me if I know more. Yes, I do.</p> <p>17 Q. (BY MS. WRIGLEY) All right. I'm going to mark</p> <p>18 another exhibit, sir, and you're going to -- I'm sure</p> <p>19 you're going to love this one, but we're going to keep</p> <p>20 doing it. Okay?</p> <p>21 MS. WRIGLEY: This is going to be 623.</p> <p>22 (Exhibit 623 marked.)</p> <p>23 Q. (BY MS. WRIGLEY) It was originally marked</p> <p>24 as -- oh, I've got an extra copy there, sir --</p> <p>25 Exhibit 110 to the complaint. This is a transcript of</p>	<p style="text-align: right;">Page 300</p> <p>1 to interrupt --</p> <p>2 A. Okay.</p> <p>3 Q. -- but I'd ask you not to interrupt me --</p> <p>4 A. Yeah.</p> <p>5 Q. -- please.</p> <p>6 A. Okay.</p> <p>7 Q. It's going to be better for her to get this</p> <p>8 down --</p> <p>9 A. Right.</p> <p>10 Q. -- so just slow down.</p> <p>11 A. Uh-huh.</p> <p>12 Q. You don't care for Christopher Krebs, correct?</p> <p>13 A. I don't know the man.</p> <p>14 Q. Okay. Do you know what his background is, sir?</p> <p>15 A. Yes. He was head of the cyber -- actually, I</p> <p>16 kind of like the guy, because he lied and then he got</p> <p>17 caught. And he said three months later that, hey, our</p> <p>18 biggest threat is China attacking us down to the local</p> <p>19 races. The guy, in my mind, that's great he said that.</p> <p>20 Q. Has Christopher Krebs ever publicly said there</p> <p>21 was any interference by China in the 2020 election?</p> <p>22 A. He publicly said three months after the 2020</p> <p>23 election, we have it on film, MSNBC with Adam Schiff.</p> <p>24 They said, what's the biggest threat to the United</p> <p>25 States right now? This is three months after 2020.</p>

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<p style="text-align: right;">Page 301</p> <p>1 Bar none, is what he said, a cyber attack</p> <p>2 by China right down to the local races. A cyber attack,</p> <p>3 isn't that through computers? That's what Chris Krebs</p> <p>4 said on national TV. I can't --</p> <p>5 Q. Now --</p> <p>6 A. If I had it here, I'd play it for you.</p> <p>7 Q. -- has Christopher Krebs ever indicated</p> <p>8 publicly that Smartmatic interfered with the 2020</p> <p>9 election?</p> <p>10 A. Like I said, all machines, a cyber attack,</p> <p>11 right down to the local races. You're a part of machine</p> <p>12 company.</p> <p>13 The only way you do that is hacking in --</p> <p>14 THE COURT REPORTER: Please slow down.</p> <p>15 Please.</p> <p>16 A. The only way you do that is to hack into a</p> <p>17 machine or to get into the machine. That includes</p> <p>18 Smartmatic. Chris Krebs said this. I'm sorry he said</p> <p>19 that about you guys.</p> <p>20 Q. (BY MS. WRIGLEY) Sir, do you see that the</p> <p>21 title of this exhibit is "Fired director of U.S. cyber</p> <p>22 agency, Chris Krebs, explains why President Trump's</p> <p>23 claims of election interference are false"? Do you see</p> <p>24 that --</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 303</p> <p>1 threat to our country was a cyber attack made to the</p> <p>2 local races from China.</p> <p>3 That's like saying I watched really good on</p> <p>4 my watch, but now we've got to worry about it because it</p> <p>5 didn't happen when I was watching, because I could see</p> <p>6 inside the machines. Chris Krebs lied.</p> <p>7 Q. Do you see at the bottom of this page where it</p> <p>8 has Chris Krebs speaking? Bottom of the paragraph, sir.</p> <p>9 It says, "I have confidence." Are you with me?</p> <p>10 Mr. Lindell, are you with me here?</p> <p>11 A. Yeah, I'm reading it. Yes.</p> <p>12 Q. "I have confidence in the security of this</p> <p>13 election because I know the work that we've done for</p> <p>14 four years in the support of our state and local</p> <p>15 partners. I know the work that the intelligence</p> <p>16 community has done, the Department of Defense has done,</p> <p>17 that the FBI has done, that my team has done. I know</p> <p>18 these systems are more secure. I know based on what we</p> <p>19 have seen that any attacks on the election were not</p> <p>20 successful." Do you see that?</p> <p>21 A. Uh-huh.</p> <p>22 Q. And in November of 2020, did you understand</p> <p>23 that Christopher Krebs publicly stated the election was</p> <p>24 secure?</p> <p>25 A. I didn't know Chris Krebs. I heard Chris --</p>
<p style="text-align: right;">Page 302</p> <p>1 Q. -- on the first page? Do you see that, sir?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Were you aware that Mr. Krebs gave an interview</p> <p>4 with 60 Minutes in November 2020 about the 2020</p> <p>5 election?</p> <p>6 A. No.</p> <p>7 Q. You weren't aware of that at the time --</p> <p>8 A. I've heard his statement.</p> <p>9 Q. Okay.</p> <p>10 A. He said it was the most secure.</p> <p>11 Q. And do you see underneath here the subtitle is</p> <p>12 "Chris Krebs, a life-long Republican, was put in charge</p> <p>13 of the agency handling the election security by</p> <p>14 President Trump a few years ago. When Krebs said the</p> <p>15 election was the country's most secure ever, Mr. Trump</p> <p>16 fired him. Now Krebs speaks to Scott Pelley"? Do you</p> <p>17 see that?</p> <p>18 A. Uh-huh.</p> <p>19 Q. Okay. And are you aware in November of 2020</p> <p>20 that Christopher Krebs, when he was head of the CISA</p> <p>21 agency in charge of the election, issued a public</p> <p>22 statement about the election being secure?</p> <p>23 A. I heard the statement. I didn't know what he</p> <p>24 ran or what he did. But I -- all I know is I was really</p> <p>25 happy when three months later, he said the biggest</p>	<p style="text-align: right;">Page 304</p> <p>1 that some Christopher Krebs said that. But you've got</p> <p>2 to understand, my -- where I was, all that stuff every</p> <p>3 day, I spent 18 hours a day doing my own investigation.</p> <p>4 Had nothing to do with what the media was saying. So I</p> <p>5 had a hundred percent proof that something happened. We</p> <p>6 better find out all these deviations.</p> <p>7 It's like I get deviations every day in</p> <p>8 numbers. I dig into them till I find the truth. And I</p> <p>9 don't care what Chris Krebs, who I didn't even know what</p> <p>10 he did back then, why he says that.</p> <p>11 I was kind of like -- I go, yeah, I</p> <p>12 remember that name when he said that's the number one</p> <p>13 threat to our country. I mean, this -- this Chris</p> <p>14 Krebs, I mean, he was obviously -- he was making it</p> <p>15 secure. What do you think he's going to say?</p> <p>16 Q. I'm going to hand to you what's been previously</p> <p>17 marked as Exhibit 582, sir. This is -- for the record,</p> <p>18 this is a page -- it shows where from the Internet of</p> <p>19 Twitter it was printed up and the day it was captured.</p> <p>20 This is a post on Twitter by Christopher Krebs when he</p> <p>21 was at CISA.</p> <p>22 A. Uh-huh.</p> <p>23 Q. Do you see at the top where it says, "To be</p> <p>24 clear on," and there's an arrow below? "I'm</p> <p>25 specifically referring to the Hammer and Scorecard</p>

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<p style="text-align: right;">Page 305</p> <p>1 nonsense. It's just that, nonsense. This is not a real</p> <p>2 thing. Don't fall for it, and think twice before you</p> <p>3 share"? Do you see that, Mr. Lindell?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Were you aware that Christopher Krebs, prior to</p> <p>6 2021, had posted on Twitter about Hammer and Scorecard?</p> <p>7 A. It's the first time I've read this.</p> <p>8 Q. You've never seen this before, sir?</p> <p>9 A. No.</p> <p>10 Q. This didn't come up in your validation or</p> <p>11 investigation mark?</p> <p>12 A. Huh-uh. Not this with Chris Krebs.</p> <p>13 Q. Okay. Did you ever investigate statements</p> <p>14 that had been made by CISA related to Hammer and</p> <p>15 Scorecard prior to 2021?</p> <p>16 A. I -- I talked to gen- -- yes, I did. I talked</p> <p>17 to generals that were involved. General McInerney,</p> <p>18 directly involved. Bill Binney, directly involved.</p> <p>19 People that were back there that built Hammer and</p> <p>20 Scorecard that helped build it. Okay. They built it.</p> <p>21 When you interview General McInerney or</p> <p>22 Colonel Waldon or General Mike Flynn, they were there.</p> <p>23 I had him and Dennis Montgomery in a room together.</p> <p>24 It's like old friends talking.</p> <p>25 You know, Dennis -- and I had General Flynn</p>	<p style="text-align: right;">Page 307</p> <p>1 isolated voting day issues are tied to some nefarious</p> <p>2 election hacking and vote manipulation operation. Don't</p> <p>3 fall for it and think twice before sharing. Check out</p> <p>4 Rumor Control for more info on the security safeguards</p> <p>5 built into election #protect2020"? Do you see that?</p> <p>6 A. Yeah.</p> <p>7 Q. Okay. And then do you see below that he's kind</p> <p>8 of --</p> <p>9 A. Yeah.</p> <p>10 Q. -- directing to a reality and rumor sheet here</p> <p>11 post election?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Do you see that?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Did you ever, prior to February of 2021, go to</p> <p>16 the CISA website to check out any information on Rumor</p> <p>17 Control?</p> <p>18 A. I talked to the people that were involved back</p> <p>19 then. And like I said, General Flynn --</p> <p>20 Q. General Flynn, yes, the generals.</p> <p>21 A. -- yeah, General McInerney worked there.</p> <p>22 Q. Yeah. I'm sorry. Did they work at CISA?</p> <p>23 A. Colonel Waldron.</p> <p>24 CISA, the only thing I heard about CISA is</p> <p>25 that they were hiding this case down in Georgia.</p>
<p style="text-align: right;">Page 306</p> <p>1 with Dennis Montgomery validate it right there. Yes,</p> <p>2 sir. Here's what I did. Remember this? Remember this?</p> <p>3 Remember this? It's real. You can't sit and tell me</p> <p>4 it's not. I did my own due diligence.</p> <p>5 Just because Chris Krebs said don't believe</p> <p>6 it, obviously, he's got another agenda. There's</p> <p>7 something hidden there. He's a uniparty Republican, as</p> <p>8 far as I'm concerned.</p> <p>9 Q. Mr. Lindell, I have just a couple follow-up</p> <p>10 questions.</p> <p>11 Were you aware that General Flynn was</p> <p>12 deposed in this litigation?</p> <p>13 A. That what?</p> <p>14 Q. General Flynn was deposed in this litigation?</p> <p>15 A. Yeah, I heard that.</p> <p>16 Q. And were you aware that he took the Fifth</p> <p>17 Amendment?</p> <p>18 MR. KACHOUROFF: Objection, relevance.</p> <p>19 A. I heard that, too.</p> <p>20 Q. (BY MS. WRIGLEY) Okay. And then I want to ask</p> <p>21 you a little bit more about 582, sir.</p> <p>22 A. What's that?</p> <p>23 Q. I'm going to ask you about 582.</p> <p>24 Do you see where Mr. Krebs referred to a</p> <p>25 previous post where he said, "Seeing #thisinfo that some</p>	<p style="text-align: right;">Page 308</p> <p>1 This -- they were stopping this case from getting</p> <p>2 public, this Halderman case, the Curling case, which</p> <p>3 involved Dominion. They held it for three and a half</p> <p>4 years.</p> <p>5 I also know CISA went to the State of South</p> <p>6 Dakota and used my name there, saying, now, don't listen</p> <p>7 to Mike Lindell. Why would they do that? Why is</p> <p>8 anybody concerned with me about Hammer Scorecard? I</p> <p>9 never told anybody on January 9th I had Hammer</p> <p>10 Scorecard.</p> <p>11 So anyway, you know, it was kind of crazy,</p> <p>12 because media outlets like CNN are coming to me, you</p> <p>13 know, Dennis Montgomery is a fraud. Well, I never said</p> <p>14 I got it from Dennis Montgomery. So this is very</p> <p>15 strange you're asking me these questions.</p> <p>16 Q. Mr. Lindell, can I ask you about that Georgia</p> <p>17 lawsuit that you mentioned that CISA held back? Where</p> <p>18 did you get that information from in connection with the</p> <p>19 lawsuit being held back in your claim that --</p> <p>20 A. From the Louisiana Secretary of State.</p> <p>21 Q. What's that person's name?</p> <p>22 A. Kyle Ardoin.</p> <p>23 Q. And --</p> <p>24 A. And Kyle Ardoin was trying to get it from them</p> <p>25 because they were warned not to use machines, not to use</p>

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<p style="text-align: right;">Page 309</p> <p>1 those machines.</p> <p>2 Q. And this person told you that CISA was doing</p> <p>3 something nefarious to hold up a lawsuit about an</p> <p>4 election --</p> <p>5 A. Either them or the judge. Who knows.</p> <p>6 Q. Okay. Or the judge was involved with something</p> <p>7 nefarious?</p> <p>8 A. They would -- they couldn't get it. He wanted</p> <p>9 to get it for the State of Louisiana. I'm working with</p> <p>10 these secretary of states. I'm getting it right from a</p> <p>11 government official, you know.</p> <p>12 I'm a guy who -- before this all happened,</p> <p>13 I'm just a guy that had a pillow company, United States,</p> <p>14 American dream, and I'm dealing with all these</p> <p>15 officials, and they're telling me this stuff. I'm</p> <p>16 sorry. I believe generals, I believe colonels, I</p> <p>17 believe cyber experts. I believe lawyers, some of them.</p> <p>18 Q. I'm just going to mark Exhibit 424 [sic].</p> <p>19 (Exhibit 624 marked.)</p> <p>20 Q. (BY MS. WRIGLEY) We'll do this one real quick,</p> <p>21 sir.</p> <p>22 A. Oh, the -- oh, my.</p> <p>23 Q. Exhibit 424 [sic] was marked --</p> <p>24 A. This is all your exhibits.</p> <p>25 Q. -- as Exhibit 111 in the complaint. Do you see</p>	<p style="text-align: right;">Page 311</p> <p>1 from taking his place in the White House. Barr told the</p> <p>2 AP that U.S. attorneys and FBI agents have been working</p> <p>3 to follow up specific complaints and information they've</p> <p>4 received, but to date, we have not seen fraud on a scale</p> <p>5 that could have effected a different outcome in the</p> <p>6 election." Do you see that?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Now, you were aware at the end of 2020 that</p> <p>9 Bill Barr had publicly stated there was no widespread</p> <p>10 fraud in the 2020 election, correct?</p> <p>11 A. Yes. But I will say -- I will do an add-on</p> <p>12 there. But then we also -- I personally had gotten a --</p> <p>13 wind of, in an E-mail that he sent to a state</p> <p>14 official -- I think it was the Secretary of State in</p> <p>15 Pennsylvania -- stand down. Do not investigate any</p> <p>16 election fraud. That was right from Bill Barr. So I --</p> <p>17 Bill Barr lost all credibility with me when he sent that</p> <p>18 out.</p> <p>19 Also, I tried to get to Bill Barr, and he</p> <p>20 would not -- it was a complete shutout. I tried to get</p> <p>21 to Bill Barr because I had questions, going all these</p> <p>22 people that are voting that don't live in those states,</p> <p>23 and I didn't the question an answer.</p> <p>24 Q. Why would Bill Barr do such a thing,</p> <p>25 Mr. Lindell? Why would he --</p>
<p style="text-align: right;">Page 310</p> <p>1 this as an AP article from December of 2020, sir?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Do you see the title of this article is</p> <p>4 "Disputing Trump, Barr says no widespread election</p> <p>5 fraud"?</p> <p>6 A. Yeah.</p> <p>7 Q. Do you see that?</p> <p>8 MS. WRIGLEY: It's Exhibit 624.</p> <p>9 MR. KACHOUROFF: 624. You said 424. I</p> <p>10 was --</p> <p>11 MS. WRIGLEY: Oh, it was the other one.</p> <p>12 Thank you. Sorry. I'm sorry. 624.</p> <p>13 Q. (BY MS. WRIGLEY) Okay. Now, if you look at --</p> <p>14 let me just read the first couple paragraphs of this,</p> <p>15 Mr. Lindell.</p> <p>16 A. Yeah.</p> <p>17 Q. It says, "Disputing President Donald Trump's</p> <p>18 persistent, baseless claims, Attorney General William</p> <p>19 Barr declared Tuesday the U.S. Justice Department has</p> <p>20 uncovered no evidence of widespread fraud" -- "voter</p> <p>21 fraud that could change the outcome of the 2020</p> <p>22 election. Barr's comments in an interview with The</p> <p>23 Associated Press contradict the concentrated [sic]</p> <p>24 effort by Trump, his boss, to subvert the results of</p> <p>25 last month's voting and block President-elect Joe Biden</p>	<p style="text-align: right;">Page 312</p> <p>1 A. You know what --</p> <p>2 Q. -- having worked and been appointed by</p> <p>3 President Trump would --</p> <p>4 A. That's a deviation. It's like --</p> <p>5 THE COURT REPORTER: I can only take one at</p> <p>6 a time.</p> <p>7 THE WITNESS: Okay.</p> <p>8 Q. (BY MS. WRIGLEY) -- reject claims of</p> <p>9 widespread fraud? Why would he do that, sir?</p> <p>10 A. Well, that's called a deviation. It's like</p> <p>11 when crooked Brad Raffensperger in Georgia -- when</p> <p>12 people do things that you can't explain, like Doug Ducey</p> <p>13 in Arizona, when he turned in the electors before the</p> <p>14 11 hours of tape by Rudy Giuliani came out. He turns</p> <p>15 it. You go why?</p> <p>16 When things are unexplainable, there's a</p> <p>17 hidden agenda. I don't know what that addenda is. I</p> <p>18 don't know why Bill Barr did not want to investigate it.</p> <p>19 I don't know. And I don't know why he came out --</p> <p>20 It's a very broad statement, there's not</p> <p>21 enough to overturn the election. You only half looked</p> <p>22 in -- if you found some, why didn't you finish looking</p> <p>23 into it, Bill? Because he did not complete it, and we</p> <p>24 have an E-mail to prove that. He said stand down. Do</p> <p>25 not investigate any more. I don't know why.</p>

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<p style="text-align: right;">Page 313</p> <p>1 That's called a deviation in behavior, and</p> <p>2 I don't know why. I'd have to talk to Bill and say,</p> <p>3 Bill, what was your reasoning for doing such a thing,</p> <p>4 stopping an investigation into this country?</p> <p>5 Q. Have you investigated Bill Barr, sir?</p> <p>6 A. No.</p> <p>7 Q. What's this E- --</p> <p>8 MR. KACHOUROFF: The attorneys have.</p> <p>9 A. Uh-huh.</p> <p>10 Q. (BY MS. WRIGLEY) What's this E-mail that</p> <p>11 you're referring to, sir?</p> <p>12 A. It's a -- it's -- that's public. You can</p> <p>13 probably find that on the Internet. He sent an E-mail</p> <p>14 to officials, I think it was the Secretary of State, in</p> <p>15 the State of Pennsylvania. Stand down. Do not</p> <p>16 investigate any more into this election.</p> <p>17 Q. And what's the date of that?</p> <p>18 A. It was in December of 2020.</p> <p>19 Q. And how did you find out about that E-mail?</p> <p>20 A. That was public. It was public.</p> <p>21 Q. Okay. And --</p> <p>22 A. It was public. Somebody got --</p> <p>23 Q. -- based on that E-mail --</p> <p>24 A. Somebody got it to me, and I'm going, you know</p> <p>25 what? And I'm going, Bill, if you only knew what I had</p>	<p style="text-align: right;">Page 315</p> <p>1 Arizona, it took ten days to count. That's</p> <p>2 1 percent. I had done the mathematics. It's impossible</p> <p>3 that they did not come back where Donald Trump didn't</p> <p>4 win by 70,000 votes. Those are mathematics.</p> <p>5 So it was pretty -- in my mind, it was</p> <p>6 absolutely impossible based on those deviations. Dig</p> <p>7 into the deviations and find the truth, then tell me</p> <p>8 there was no widespread fraud. But nobody did that.</p> <p>9 This -- I'm telling you right now, probably</p> <p>10 the first time you ever heard that those 106,000 votes</p> <p>11 in the middle of the night that went like this</p> <p>12 (gesturing) for Michigan, those were not mail-in votes</p> <p>13 like they told us. The media lied to us. They were --</p> <p>14 the -- they were counted on the morning of the 3rd. So</p> <p>15 I'd like to know why. Give me an answer.</p> <p>16 MS. WRIGLEY: Move to strike as</p> <p>17 nonresponsive.</p> <p>18 Q. (BY MS. WRIGLEY) I've handed to you what's</p> <p>19 been marked as Exhibit 625, sir.</p> <p>20 (Exhibit 625 marked.)</p> <p>21 Q. (BY MS. WRIGLEY) This was marked as Exhibit 72</p> <p>22 to the complaint. It's a printout from Dominion's</p> <p>23 website. It was updated on November 17th, 2020.</p> <p>24 If you can turn to the second page, do you</p> <p>25 see that the title of this section from the website is</p>
<p style="text-align: right;">Page 314</p> <p>1 here. I was finding all these states where the people</p> <p>2 voted that didn't live there. And that's what I wanted</p> <p>3 to get to. Yeah.</p> <p>4 Q. And because of that E-mail, you're completely</p> <p>5 disregarding any credibility that Bill Barr had --</p> <p>6 A. It didn't make sense -- it didn't make sense</p> <p>7 why Bill Barr would not check into that or why he</p> <p>8 wouldn't check into when he knew those 106,000 votes in</p> <p>9 Michigan, they weren't counted on the -- they weren't</p> <p>10 mail-in votes. They were counted on the morning of the</p> <p>11 3rd. He --</p> <p>12 Q. Would it make sense if there was no widespread</p> <p>13 fraud, sir?</p> <p>14 A. What's that?</p> <p>15 Q. Would it make sense if there was, in fact, no</p> <p>16 widespread fraud in the election?</p> <p>17 A. When you --</p> <p>18 Q. It would make sense, right?</p> <p>19 A. No, it wouldn't make sense when you have the</p> <p>20 deviations that happened on the morning of the 4th.</p> <p>21 Let me tell you this: If we'd have all</p> <p>22 went to bed on the morning of the 4th and the algorithms</p> <p>23 hadn't been broke, where they had shut down five states</p> <p>24 at the same time, an order, shut them down. They shut</p> <p>25 them down. Every one had a different excuse.</p>	<p style="text-align: right;">Page 316</p> <p>1 "Setting the record straight: Facts and rumors.</p> <p>2 Dominion voting systems categorically denies false</p> <p>3 assertions about vote switching and software issues with</p> <p>4 our voting systems"? Do you see that?</p> <p>5 A. Uh-huh.</p> <p>6 Q. And then do you see underneath of there it</p> <p>7 says, "According to a joint statement by the Federal</p> <p>8 Government agency that oversees U.S. election security,</p> <p>9 the Department of Homeland Security's Cybersecurity &</p> <p>10 Infrastructure Security Agency, CISA, 'There is no</p> <p>11 evidence that any voting system deleted or lost votes,</p> <p>12 changed votes or was in any way compromised.' The</p> <p>13 government and private sector councils that support this</p> <p>14 mission called the 2020 election 'the most secure in</p> <p>15 American history.'" Do you see that?</p> <p>16 A. And you believe that?</p> <p>17 Q. Sir --</p> <p>18 A. Because Chris Krebs said that, right?</p> <p>19 Q. Let me --</p> <p>20 A. Who got fired.</p> <p>21 Q. Let me ask you a question. Were you familiar</p> <p>22 that CISA had issued a statement such as this --</p> <p>23 A. No.</p> <p>24 Q. -- that's reflected in Dominion's website?</p> <p>25 A. No.</p>

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<p style="text-align: right;">Page 317</p> <p>1 Q. Are -- did you know at the end of 2020 that</p> <p>2 Dominion had a section on its websites --</p> <p>3 A. No.</p> <p>4 Q. -- addressing facts and rumors?</p> <p>5 A. No.</p> <p>6 Q. Okay. Let me ask you this: Prior to February</p> <p>7 5th, 2021, did you visit the website of Dominion?</p> <p>8 A. No.</p> <p>9 Q. Prior to February 5th, 2021, did you visit the</p> <p>10 website of Smartmatic?</p> <p>11 A. No.</p> <p>12 Q. Prior to February 5th, 2021, did you visit the</p> <p>13 website of ES&S?</p> <p>14 A. No.</p> <p>15 Q. Prior to February 5th, 2021, did you visit the</p> <p>16 website of Hart InterCivic?</p> <p>17 A. No.</p> <p>18 Q. Prior to February 5th, 2021, did you visit the</p> <p>19 website of any voting company?</p> <p>20 A. No.</p> <p>21 Q. And so you didn't look at the websites of</p> <p>22 either Smartmatic or Dominion and try to investigate</p> <p>23 election fraud before you put out Absolute Proof?</p> <p>24 A. No. I -- they're not going to put it on their</p> <p>25 website. Hey, I will tell you what I did do. I'm going</p>	<p style="text-align: right;">Page 319</p> <p>1 helped us. Yes.</p> <p>2 Q. And do you put information about the company on</p> <p>3 that website, sir?</p> <p>4 A. If I was a corrupt company, I certainly</p> <p>5 wouldn't put anything out there.</p> <p>6 Q. How would anybody know whether MyPillow is a</p> <p>7 corrupt company, sir?</p> <p>8 A. Why would I look at Dominion's website if it</p> <p>9 was going to be something up -- look, if I was a private</p> <p>10 eye, I'd be doing -- which I've hired many private eyes</p> <p>11 in this investigation.</p> <p>12 Q. What are the names of the private eyes you've</p> <p>13 hired to investigate Smartmatic?</p> <p>14 A. I'd -- you'd have to get that from my</p> <p>15 attorneys. We hired a whole -- one whole team, that was</p> <p>16 a quarter million. We hired another one. That Brent</p> <p>17 guy we didn't hire, but he was -- that's what he does.</p> <p>18 I don't -- he was never paid, said I want to do it for</p> <p>19 free. But there was a company that was hired, \$200,000.</p> <p>20 Q. Sir, if you look at the second page of this --</p> <p>21 can I have you flip into the exhibit, please. It's 625.</p> <p>22 Do you see that there's a section number 2, "Assertions</p> <p>23 of super computer election fraud conspiracies are 100</p> <p>24 percent false"? Do you see that?</p> <p>25 A. They put that in Smartmatic's website?</p>
<p style="text-align: right;">Page 318</p> <p>1 to bring this up right now, and I'll talk slow.</p> <p>2 I was in Georgia. I'm going to tell you</p> <p>3 where I'm coming from. I was in Georgia --</p> <p>4 MS. WRIGLEY: Sir, I'm just going to</p> <p>5 object. There's no -- there's no question pending --</p> <p>6 A. Well, I'm going to tell you something. I was</p> <p>7 in Georgia --</p> <p>8 MS. WRIGLEY: -- it's nonresponsive and</p> <p>9 it's wasting the time.</p> <p>10 A. I'm going to say I was in Georgia on</p> <p>11 January 4th at the -- where the two senators were going</p> <p>12 to be in the runoff. I sat and got on my knees and</p> <p>13 prayed that they would steal both of them. And why</p> <p>14 would I do that? You know why? Because if they would</p> <p>15 have just said give them back a Republican so they shut</p> <p>16 up about this election, I knew right then if they took</p> <p>17 them both that the public would go, you know, hey, we've</p> <p>18 got to look into these problems. We've got to look into</p> <p>19 these computers and machines. And my prayers were</p> <p>20 answered. So here we are.</p> <p>21 Q. (BY MS. WRIGLEY) Sir, does MyPillow have a</p> <p>22 website?</p> <p>23 A. What's that?</p> <p>24 Q. Does MyPillow have a website?</p> <p>25 A. I don't know if you bought any pillows, but it</p>	<p style="text-align: right;">Page 320</p> <p>1 Q. This is on Dominion's website, sir. But you've</p> <p>2 never seen it, right?</p> <p>3 A. No.</p> <p>4 Q. Okay. And do you see where it says, "The</p> <p>5 Cybersecurity & Infrastructure Security Agency, CISA,</p> <p>6 has debunked claims about the existence of a secret CIA</p> <p>7 program for voter fraud called Hammer and Scorecard."</p> <p>8 Do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. And it's got some bullet points --</p> <p>11 A. Uh-huh.</p> <p>12 Q. -- describing this --</p> <p>13 A. Uh-huh.</p> <p>14 Q. -- voting systems in the United States. Do you</p> <p>15 see that?</p> <p>16 A. Yeah.</p> <p>17 Q. The first one says, "All U.S. voting systems</p> <p>18 must provide assurance that they work accurately and</p> <p>19 reliably as intended under Federal U.S. EAC and date</p> <p>20 certifications and testing requirements. Election</p> <p>21 safeguards from testing and certification of voting</p> <p>22 systems to canvassing and auditing prevent malicious</p> <p>23 actors from tampering with vote counts and ensure final</p> <p>24 vote tallies are accurate. Read more from CISA." Do</p> <p>25 you see that, sir?</p>

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<p style="text-align: right;">Page 321</p> <p>1 A. Uh-huh.</p> <p>2 Q. Are you familiar that there are certification</p> <p>3 requirements for voting systems --</p> <p>4 A. Yep.</p> <p>5 Q. -- in the United States?</p> <p>6 A. I certainly do, because I've spearheaded</p> <p>7 lawsuits against machine companies, Dominion -- i.e.,</p> <p>8 Dominion in both Arizona, then I was going state by</p> <p>9 state. Arizona, we're still in like the fourth appeal.</p> <p>10 They weren't certified. They're not</p> <p>11 certified. They were illegal. That's what the Georgia</p> <p>12 case says in Georgia. Very similar to the Curling case,</p> <p>13 the cases I have, the lawsuits I have out there against</p> <p>14 these machine companies. Not yours. This was in</p> <p>15 Arizona, Alabama, and I was going to go state by state.</p> <p>16 They're not certified. They lied. They</p> <p>17 lied. They're all online, and they lied and lied. So</p> <p>18 they broke the -- you could almost take any -- if you're</p> <p>19 talking about Dominion now, not yourself, I can say this</p> <p>20 about Dominion. They are not certified. They break</p> <p>21 laws in most of the counties -- or most -- I mean, most</p> <p>22 of the states.</p> <p>23 Louisiana is their longest running partner,</p> <p>24 and they're out of date, they're out of certification.</p> <p>25 They weren't certified. There's so many laws that they</p>	<p style="text-align: right;">Page 323</p> <p>1 correct?</p> <p>2 A. (Witness indicated by nodding his head</p> <p>3 affirmatively.)</p> <p>4 Q. NewsMax has a website, correct?</p> <p>5 A. Yeah.</p> <p>6 Q. And there's information about NewsMax on its</p> <p>7 website, correct?</p> <p>8 A. Uh-huh. Yeah.</p> <p>9 Q. Now, I don't know. Let's say Pfizer, the</p> <p>10 pharmaceutical company, are you familiar with Pfizer?</p> <p>11 It has a website, correct?</p> <p>12 A. Uh-huh.</p> <p>13 Q. And it puts out information about itself on the</p> <p>14 website, correct?</p> <p>15 A. Uh-huh.</p> <p>16 Q. And so how does anybody know if information on</p> <p>17 a website's correct or not, sir?</p> <p>18 A. You do your own due diligence like I did.</p> <p>19 Q. Okay. But one basic step would be to go to a</p> <p>20 company's website and look for --</p> <p>21 A. No.</p> <p>22 Q. -- information about it?</p> <p>23 No?</p> <p>24 A. No. I would go -- if I want to investigate a</p> <p>25 company -- I haven't been to Fox News's website, but I</p>
<p style="text-align: right;">Page 322</p> <p>1 broke. They probably broke more laws by accident than</p> <p>2 you guys did on purpose.</p> <p>3 MS. WRIGLEY: I'm going to strike that as</p> <p>4 nonresponsive.</p> <p>5 Q. (BY MS. WRIGLEY) This is Exhibit 626, sir.</p> <p>6 (Exhibit 626 marked.)</p> <p>7 Q. (BY MS. WRIGLEY) This is a printout from</p> <p>8 Smartmatic's website. It is marked as Exhibit 66 to the</p> <p>9 complaint.</p> <p>10 Do you see, if you look to the first page,</p> <p>11 that it says, "Smartmatic fact checked"? Do you see</p> <p>12 that?</p> <p>13 A. Uh-huh. Did you guys write this?</p> <p>14 Q. This was information from the website. Have --</p> <p>15 have you ever been to Smartmatic's website, sir?</p> <p>16 A. No. No.</p> <p>17 Q. No.</p> <p>18 A. I can write nice things about you, too, if I</p> <p>19 want. Can I write some of your facts on there?</p> <p>20 Q. No. There's a number of companies that have</p> <p>21 websites on the Internet, correct?</p> <p>22 A. Yeah.</p> <p>23 Q. And MyPillow has a website, correct?</p> <p>24 A. That's right.</p> <p>25 Q. And there's information about MyPillow,</p>	<p style="text-align: right;">Page 324</p> <p>1 investigated them. I don't go -- I'm not going to go to</p> <p>2 a website and read their fluff.</p> <p>3 Q. Okay. And so whatever you put on the website</p> <p>4 for MyPillow, nobody should trust that information,</p> <p>5 correct?</p> <p>6 A. No. That's not what I said. If I was under</p> <p>7 investigation that I did something, you would go around,</p> <p>8 you would go investigate the company. Have you guys</p> <p>9 been to my website? You think I'm going to -- from</p> <p>10 MyPillow, you're going to buy pillows there. That's</p> <p>11 what you do.</p> <p>12 What -- I didn't even know if Smart- -- to</p> <p>13 be honest with you, I didn't even know Smartmatic had a</p> <p>14 website. What, to sell your machines to someone?</p> <p>15 There's a -- why would Smartmatic have a website if</p> <p>16 you're selling machines to our government? That doesn't</p> <p>17 make sense.</p> <p>18 Q. Mr. Lindell -- Mr. Lindell, let me ask you</p> <p>19 this: You're familiar when corporations get</p> <p>20 incorporated, they have to do filings in this country,</p> <p>21 correct?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. And your company has corporate filings,</p> <p>24 right?</p> <p>25 A. Right.</p>

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<p style="text-align: right;">Page 325</p> <p>1 Q. And those are public records, right?</p> <p>2 A. Right.</p> <p>3 Q. Have you done any public record searches for</p> <p>4 Smartmatic in terms of any incorporation papers?</p> <p>5 A. My -- yes. My -- but not me personally. I</p> <p>6 have private eyes.</p> <p>7 Q. Did you do it before "Absolute Proof," sir?</p> <p>8 A. I don't know. I don't know when the one guy</p> <p>9 started. I know that they -- I know one of them did for</p> <p>10 sure. There was one involved for sure, but it wasn't</p> <p>11 one of the private eye companies.</p> <p>12 Q. What -- I'm sorry, what are the private eye</p> <p>13 companies that you've hired, sir? What are their names?</p> <p>14 A. I don't know their names. You would have to</p> <p>15 get the -- Curt has that.</p> <p>16 Q. Okay. But you've hired, in connection with</p> <p>17 your documentaries, private investigators to --</p> <p>18 A. No, it wasn't the docu --</p> <p>19 Q. -- identify information for those things?</p> <p>20 A. A documentary is to get the word out. This was</p> <p>21 an ongoing investigation into machine companies and to</p> <p>22 get rid of them.</p> <p>23 Q. Okay.</p> <p>24 A. That's what it was.</p> <p>25 Q. Is there any information that you've obtained</p>	<p style="text-align: right;">Page 327</p> <p>1 A. I'm sorry. Yeah. I mean --</p> <p>2 Q. Okay? Lindell TV, FrankSpeech, MyPillow.</p> <p>3 A. I mean, but I put up --</p> <p>4 Q. I printed the entire website up there.</p> <p>5 A. Right. That's why I put -- right.</p> <p>6 Q. So you've got fans.</p> <p>7 A. Okay. But I --</p> <p>8 Q. So can we leave that now and let me get to the</p> <p>9 questions?</p> <p>10 A. Yeah. Okay. I'm just saying that the</p> <p>11 investigator then -- the investigation -- I relied more</p> <p>12 on people that were there, General Flynn, General</p> <p>13 McInerney, which I hope you talk to him. They were</p> <p>14 there. They were there with Hammer Scorecard. They</p> <p>15 were there. They validated.</p> <p>16 It's all real. Dennis's stuff is real.</p> <p>17 I'd seen -- I just had General Flynn with them not even</p> <p>18 three months ago. It was like two people talking</p> <p>19 like --</p> <p>20 Q. Mr. Lindell --</p> <p>21 MR. KACHOUROFF: Let her ask the question.</p> <p>22 THE WITNESS: Right. Yeah.</p> <p>23 Q. (BY MS. WRIGLEY) Let me ask you about the</p> <p>24 generals. When you say the general, you're referring to</p> <p>25 General McInerney and Michael Flynn, correct?</p>
<p style="text-align: right;">Page 326</p> <p>1 from private investigators you've hired to look into</p> <p>2 Smartmatic that you've relied upon in publishing your</p> <p>3 documentary movies?</p> <p>4 A. Absolutely.</p> <p>5 Q. And what --</p> <p>6 A. And not the documentary --</p> <p>7 Q. -- are those private investigators' names?</p> <p>8 A. I don't know.</p> <p>9 Q. You don't know, do you?</p> <p>10 A. No. No, those were cyber guys. Okay? Cyber</p> <p>11 guys and a general -- two generals and a colonel.</p> <p>12 And by the way, all that's put into a</p> <p>13 library at Cause of America. All this stuff is sitting</p> <p>14 there in Cause of America, and evidence against y'all is</p> <p>15 at FrankSpeech. Hit the button inside the machines. I</p> <p>16 posted it all. It's very public.</p> <p>17 Have you looked at my website to do your</p> <p>18 due diligence? I put all the evidence right there. You</p> <p>19 should look at FrankSpeech website.</p> <p>20 Q. I --</p> <p>21 A. Everything against you is right there.</p> <p>22 Q. We've looked a lot at FrankSpeech, sir.</p> <p>23 A. I'm sorry.</p> <p>24 Q. We're probably one of your top viewers on</p> <p>25 FrankSpeech.</p>	<p style="text-align: right;">Page 328</p> <p>1 A. And Colonel Waldron.</p> <p>2 Q. And Colonel Waldron.</p> <p>3 A. I've never met these guys before, and they're</p> <p>4 saying it's all real. It's hundred percent, Mike. What</p> <p>5 you've got is real.</p> <p>6 Q. And --</p> <p>7 A. Hundred percent true.</p> <p>8 Q. -- what official role did General Michael Flynn</p> <p>9 have in connection with anything having to do with the</p> <p>10 2020 presidential election?</p> <p>11 A. He was -- he was the -- in charge back when</p> <p>12 Hammer Scorecard was -- back -- back when Hammer</p> <p>13 Scorecard was developed. You've got to go back with</p> <p>14 Brennan and Clapper. I'm sure you heard all this from</p> <p>15 Mary Fanning if you talked to her.</p> <p>16 But back then, Flynn was a -- I think he</p> <p>17 was a Democrat or whatever. I think so, but I don't</p> <p>18 know, under Obama or maybe Bush. I don't even remember</p> <p>19 that part because I wasn't into politics. I was smoking</p> <p>20 crack back then.</p> <p>21 Q. Mr. Lindell, I'm talking about the 2020</p> <p>22 election. What role did General Michael Flynn have in</p> <p>23 connection with the 2020 election? What role?</p> <p>24 A. What role? Yeah, probably nothing as far as</p> <p>25 the 2020 election.</p>

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<p style="text-align: right;">Page 329</p> <p>1 Q. Let me ask you about General McInerney. Did</p> <p>2 General McInerney have any role in connection with the</p> <p>3 2020 presidential election?</p> <p>4 A. You know what? I guess they both did, because</p> <p>5 they both have -- can validate the evidence that I had,</p> <p>6 and so that's directly involved with the 2020 election.</p> <p>7 Q. But they had no official role, correct, sir?</p> <p>8 A. No. They could just validate the evidence that</p> <p>9 I got on January 9th.</p> <p>10 Q. They're not being asked by any government</p> <p>11 agencies to do anything in connection with the 2020</p> <p>12 election, either General McInerney or General Michael</p> <p>13 Flynn, correct?</p> <p>14 A. No, I don't believe so. Maybe Colonel Waldron</p> <p>15 was, though.</p> <p>16 Q. Now, did Colonel Waldron have an official role</p> <p>17 in connection with the 2020 --</p> <p>18 A. I think he might have.</p> <p>19 Q. What was the role?</p> <p>20 A. I don't know. I don't know, but he -- I</p> <p>21 believe he still works for the government, and I believe</p> <p>22 it's cyber. It has to do with the United States</p> <p>23 security, so I believe he still works for the</p> <p>24 government.</p> <p>25 Q. So let me just make sure the record's clear.</p>	<p style="text-align: right;">Page 331</p> <p>1 Q. -- documentary series?</p> <p>2 A. I never went to Smartmatic's website. Didn't</p> <p>3 know they had one. If I look for a manufacturer, I</p> <p>4 can't find their websites.</p> <p>5 Q. And were you aware prior to February 5th, 2021</p> <p>6 whether ES&S had put out information on the website</p> <p>7 about whether voting machines could be hacked?</p> <p>8 A. No.</p> <p>9 Q. You never went to the ES&S website?</p> <p>10 A. No.</p> <p>11 Q. Okay. Now let me focus on Dominion. Before</p> <p>12 the end of 2020, did you receive any letters or</p> <p>13 correspondence from attorneys for Dominion related to</p> <p>14 claims that you were making about the company and its</p> <p>15 voting machines?</p> <p>16 A. I don't believe. I think it was the end of</p> <p>17 January.</p> <p>18 Q. Okay. I'm going to hand you --</p> <p>19 A. Could be the end of December, could have been</p> <p>20 January, but I know I didn't see it until probably</p> <p>21 January.</p> <p>22 Q. I'm going to hand you an exhibit. This is 627,</p> <p>23 sir.</p> <p>24 (Exhibit 627 marked.)</p> <p>25 A. Yeah. That's December, yeah.</p>
<p style="text-align: right;">Page 330</p> <p>1 With respect to General Phil Waldron, you don't know</p> <p>2 what he --</p> <p>3 A. It's Colonel Waldron.</p> <p>4 Q. Colonel Waldron. You don't know --</p> <p>5 A. Oh, I'm sure they -- I believe he still worked</p> <p>6 for the government. When I met him, he was, and I think</p> <p>7 he's deep into the cyber -- that world.</p> <p>8 Q. Did he have a role in connection with the 2020</p> <p>9 presidential election?</p> <p>10 A. I believe he did. I don't know -- I can't say</p> <p>11 a hundred percent for sure, but I believe he did.</p> <p>12 Q. So going back to --</p> <p>13 A. As far as security, like a -- you know, I mean,</p> <p>14 security to make sure to try and --</p> <p>15 Q. Going back to Exhibit 626 that's in front of</p> <p>16 you, which is a printout from Smartmatic's website, just</p> <p>17 to be clear, this is never any information that you</p> <p>18 consulted prior to putting out your "Absolute Proof"</p> <p>19 documentary series?</p> <p>20 A. Say that again.</p> <p>21 Q. Going back to 626, which is a printout from the</p> <p>22 Smartmatic website, to be clear, none of this is</p> <p>23 information you consulted prior to putting out your</p> <p>24 "Absolute Proof" --</p> <p>25 A. I never went to Smart- --</p>	<p style="text-align: right;">Page 332</p> <p>1 Q. (BY MS. WRIGLEY) Okay. Do you see, looking at</p> <p>2 the first page -- and this is Bates stamped DEF 001068,</p> <p>3 and it has an attachment, which was 1069, and the</p> <p>4 attachment has three pages. Do you see this is an</p> <p>5 E-mail from somebody at Clare Locke to yourself on</p> <p>6 December 23rd, 2020?</p> <p>7 A. I don't know if I've ever read this one.</p> <p>8 Q. Okay. Looking at the top, do you see it's an</p> <p>9 E-mail to you, sir?</p> <p>10 A. It says it's E-mailed to me, correct.</p> <p>11 Q. The subject is "Notice of" --</p> <p>12 A. That's an E-mail that I rarely use. I don't</p> <p>13 know -- I don't ever remember reading this here, this</p> <p>14 particular letter.</p> <p>15 Q. Well, so let me ask you about the subject here.</p> <p>16 A. Okay.</p> <p>17 Q. We'll walk through it, sir.</p> <p>18 The subject is "Notice of obligation to</p> <p>19 preserve documents related to Dominion." Do you see</p> <p>20 that?</p> <p>21 A. Yeah.</p> <p>22 Q. It's on the first page.</p> <p>23 And on the E-mail it says, "Mr. Lindell,</p> <p>24 please see the attached correspondence from Tom Clare</p> <p>25 and Megan Meier, and kindly confirm receipt." Do you</p>

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<p style="text-align: right;">Page 333</p> <p>1 see that? It's on the first page on the E-mail.</p> <p>2 A. Yeah.</p> <p>3 Q. Now, if you go to the attachment, do you see</p> <p>4 that this is a letter from the law firm Clare Locke</p> <p>5 addressed to yourself? Do you see that, sir?</p> <p>6 A. Yeah.</p> <p>7 Q. The first paragraph states, "Our law firm is</p> <p>8 defamation counsel to U.S. Dominion, Inc. We write</p> <p>9 regarding your patently false accusations that Dominion</p> <p>10 has somehow rigged or otherwise improperly influenced</p> <p>11 the U.S. presidential election. Despite knowing your</p> <p>12 implausible attacks against Dominion have no basis, in</p> <p>13 reality, you have participated in the vast and</p> <p>14 concentrated misinformation campaign to slander</p> <p>15 Dominion." Do you see that?</p> <p>16 A. Uh-huh.</p> <p>17 Q. And do you recall in December of 2020, counsel</p> <p>18 for Dominion writing to you about your participating in</p> <p>19 a misinformation campaign to slander the company?</p> <p>20 A. Okay.</p> <p>21 Q. Do you recall their lawyers informing you of</p> <p>22 this?</p> <p>23 A. I -- I don't know if I read this back then, but</p> <p>24 it looks -- yeah, I probably did.</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 335</p> <p>1 A. Uh-huh.</p> <p>2 Q. Do you see that?</p> <p>3 A. Yep.</p> <p>4 Q. Do you recall being told by Dominion or being</p> <p>5 demanded -- Dominion demanding that you cease and desist</p> <p>6 making defamatory claims about the company?</p> <p>7 A. Yeah, but I didn't make any defamatory claims.</p> <p>8 I made -- my stuff was all true. I did my own</p> <p>9 investigation.</p> <p>10 Q. So you would have been --</p> <p>11 A. I never made a defamatory claim. That's --</p> <p>12 what you just said there, do you recall that, it's the</p> <p>13 way you're saying that is wrong. Do I recall them</p> <p>14 saying not to say defamatory? I listened to them very,</p> <p>15 very truthfully, very carefully. So I only said the</p> <p>16 truth, just like I do about Smartmatic.</p> <p>17 Q. Now, after receiving and reviewing this letter,</p> <p>18 which you said was probably in January 2021, you</p> <p>19 continued to make claims about Dominion being involved</p> <p>20 in rigging the 2020 election, correct?</p> <p>21 A. Especially after January 9th, correct. Once I</p> <p>22 could confirm all the evidence I had that this -- that</p> <p>23 it did come from the -- I was 95 percent sure, because</p> <p>24 there's no way to explain millions of people voting in</p> <p>25 all these states that don't live there. You can't even</p>
<p style="text-align: right;">Page 334</p> <p>1 A. So...</p> <p>2 Q. Now, if you look at the second paragraph, it</p> <p>3 says, "Last --</p> <p>4 A. To be honest with you, I think I didn't read</p> <p>5 this till January.</p> <p>6 Q. You might have read it in January of 2021?</p> <p>7 A. Yeah, that's when I read it. I know I didn't</p> <p>8 read it in December, even though it says December,</p> <p>9 because I --</p> <p>10 Q. Now --</p> <p>11 A. -- think I went back and searched Dominion in</p> <p>12 my E-mail and said that's an E-mail I rarely ever used,</p> <p>13 that M Lindell.</p> <p>14 Q. The second paragraph states, sir, "Last week,</p> <p>15 we sent letters to Sidney Powell and various media</p> <p>16 entities demanding retraction of their myriad false and</p> <p>17 conspiratorial claims about Dominion."</p> <p>18 A. Uh-huh.</p> <p>19 Q. "Recently, you have positioned yourself as a</p> <p>20 prominent leader of the ongoing misinformation campaign.</p> <p>21 Accordingly, Dominion formally demands that you, 1,</p> <p>22 cease and desist making defamatory claims against</p> <p>23 Dominion; and 2, preserve and retain all documents</p> <p>24 relating to Dominion and your smear campaign against the</p> <p>25 company."</p>	<p style="text-align: right;">Page 336</p> <p>1 explain that. Nobody can. How can you have -- every</p> <p>2 state in every county in the United States have people</p> <p>3 that voted and that didn't vote in that county that</p> <p>4 don't live there? It's impossible.</p> <p>5 So when -- on January 9th, it was all</p> <p>6 confirmed to me, and I never shut up. I never will.</p> <p>7 Q. So --</p> <p>8 A. I can't. I can't or we lose our country.</p> <p>9 Q. So, Mr. Lindell, even after receiving a letter</p> <p>10 like this from Dominion's lawyers warning and about</p> <p>11 litigation being imminent --</p> <p>12 A. It's like racketeering.</p> <p>13 Q. Hold on.</p> <p>14 A. Are you kidding me?</p> <p>15 Q. Hold on. You continued to make claims about</p> <p>16 Dominion, correct?</p> <p>17 A. Yeah. This is like racketeering, except you</p> <p>18 don't succeed --</p> <p>19 Q. Nothing -- nothing would stop you, right?</p> <p>20 A. No, not knowing what I know, absolutely.</p> <p>21 Q. Okay.</p> <p>22 A. Knowing what I know, my own due diligence, not</p> <p>23 by what Sidney Powell said or Rudy Giuliani said or all</p> <p>24 these other deviations, what I found myself, with the</p> <p>25 due diligence I did, I will never, ever stop. You could</p>

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<p style="text-align: right;">Page 337</p> <p>1 put a lie detector. I'm a hundred percent right, and I</p> <p>2 will never back down from that ever. We lose our</p> <p>3 country.</p> <p>4 Q. And, Mr. Lindell, as you sit here today, it's</p> <p>5 your testimony that you will never stop making claims</p> <p>6 that Smartmatic was involved in rigging the 2020</p> <p>7 election?</p> <p>8 A. I will never stop making claims that we need to</p> <p>9 get rid of these voting machines, including your brand,</p> <p>10 in our country. Just like all the Democrats said the</p> <p>11 same thing about y'all. Amy Klobuchar, Kamala Harris,</p> <p>12 they all said that. The hundreds of Democrats in the</p> <p>13 film, everyone said the same thing about you guys.</p> <p>14 Q. So Mr. Lindell --</p> <p>15 A. Everyone did.</p> <p>16 Q. -- let me -- I want to make sure you hear my</p> <p>17 question. As you sit here today, will you ever stop</p> <p>18 making claims that Smartmatic was involved in rigging</p> <p>19 the 2020 election?</p> <p>20 A. I will never stop making claims that we need to</p> <p>21 get rid of Smartmatic and every other brand of</p> <p>22 computer used in our elections.</p> <p>23 Q. That's -- that's not what I'm asking,</p> <p>24 Mr. Lindell. I'm asking about claims that Smartmatic</p> <p>25 rigged the 2020 election. Will you continue to</p>	<p style="text-align: right;">Page 339</p> <p>1 used. I don't -- knowing what I know now, any election</p> <p>2 that's ever used with computers, I don't care if it's in</p> <p>3 the polling books, the border rolls or their -- I will</p> <p>4 never trust an election in history that uses a computer.</p> <p>5 Q. So I -- let me make just sure I'm clear,</p> <p>6 because I'm not asking about getting rid of the voting</p> <p>7 machines. I'm asking about your statement that the</p> <p>8 Smartmatic voting machines were used to rig the 2020</p> <p>9 election?</p> <p>10 A. They were used -- absolutely used --</p> <p>11 Q. But are you going to --</p> <p>12 A. -- like any other voting machine companies</p> <p>13 were. Absolutely. Hundred percent. The answer is yes.</p> <p>14 Yes, they were used.</p> <p>15 Q. You will continue -- will you continue to make</p> <p>16 claims that Smartmatic rigged the 2020 election, sir?</p> <p>17 MR. KACHOUROFF: Objection. That wasn't</p> <p>18 his testimony. He answered the question several times</p> <p>19 now.</p> <p>20 THE WITNESS: Yeah. That's the --</p> <p>21 MS. WRIGLEY: He's not answered it.</p> <p>22 MR. KACHOUROFF: He did.</p> <p>23 Q. (BY MS. WRIGLEY) Sir, will you continue to</p> <p>24 make those claims?</p> <p>25 MR. KACHOUROFF: He said voting machines</p>
<p style="text-align: right;">Page 338</p> <p>1 make those claims?</p> <p>2 MR. KACHOUROFF: Objection to form.</p> <p>3 A. Yeah, I don't know -- I don't know what you're</p> <p>4 asking there.</p> <p>5 Q. (BY MS. WRIGLEY) Okay. Well, you had said we</p> <p>6 need to get rid of the voting machines.</p> <p>7 A. Absolutely, we do.</p> <p>8 Q. That's different from rigging the election,</p> <p>9 correct? Do you understand the distinction?</p> <p>10 A. What's that?</p> <p>11 Q. You said we need to get rid of the voting</p> <p>12 machines.</p> <p>13 A. We have to.</p> <p>14 Q. Okay.</p> <p>15 A. We have to.</p> <p>16 Q. Now, that is different from saying Smartmatic's</p> <p>17 voting machines rigged the 2020 election, correct?</p> <p>18 A. Their -- they were definitely used to rig the</p> <p>19 2020 election. Hundred percent.</p> <p>20 Q. Okay. Now, are you going to continue to make</p> <p>21 claims that Smartmatic rigged the 2020 election?</p> <p>22 A. I have -- what I have said is we have to get</p> <p>23 rid of them. There -- it could be any election. There</p> <p>24 is no machine -- and they asked me once, Mike, do you</p> <p>25 trust the 2016 election? No, because machines were</p>	<p style="text-align: right;">Page 340</p> <p>1 are being used to rig the election.</p> <p>2 A. Yes.</p> <p>3 MS. WRIGLEY: That was not the answer.</p> <p>4 That's nonresponsive.</p> <p>5 A. I am going to continue to preach to get rid of</p> <p>6 all machine companies in our -- in these elections. If</p> <p>7 somebody asked me if Smartmatic was used -- if their</p> <p>8 machines were used to rig the 2020 election, I will say</p> <p>9 yes, until -- forever. You guys -- you can't change</p> <p>10 history. You guy did it, and that you were part of it,</p> <p>11 and that's it.</p> <p>12 Q. (BY MS. WRIGLEY) I'm going to hand you</p> <p>13 Exhibit 628, sir.</p> <p>14 (Exhibit 628 marked.)</p> <p>15 Q. (BY MS. WRIGLEY) 628 is DEF 000718 that has a</p> <p>16 letter attached, which was produced as 719, and the</p> <p>17 letter is four pages.</p> <p>18 Sir, looking at 628, do you see in the</p> <p>19 first page it's an E-mail chain that starts on</p> <p>20 January 8th, 2021 and then goes to January 9th, 2021?</p> <p>21 It's on the first page, sir.</p> <p>22 A. (Witness peruses document.)</p> <p>23 Q. Do you see this E-mail from January 2021?</p> <p>24 A. Yes. Yes, I see it. Yeah.</p> <p>25 Q. Okay. And this is a letter you received,</p>

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<p style="text-align: right;">Page 341</p> <p>1 another letter from Dominion's lawyers?</p> <p>2 A. Yes.</p> <p>3 Q. And the letter that's attached is dated</p> <p>4 January 8, 2021, correct?</p> <p>5 A. Yes.</p> <p>6 Q. The subject is "Your false and defamatory</p> <p>7 claims concerning Dominion." Do you see that?</p> <p>8 A. The -- yes.</p> <p>9 Q. First paragraph states, "We write again on</p> <p>10 behalf of U.S. Dominion, Inc. to supplement our</p> <p>11 December 22, 2020 demand for retraction."</p> <p>12 A. Uh-huh.</p> <p>13 Q. Do you see that?</p> <p>14 A. Yep.</p> <p>15 Q. Second paragraph. "In the past several weeks,</p> <p>16 you have falsely accused Dominion of fraud and stealing</p> <p>17 millions of votes. And on December 21st, 2020, you</p> <p>18 appeared with Sebastian Gorka on Greg Kelly Reports to</p> <p>19 peddle defamatory falsehoods about Dominion. When</p> <p>20 discussing the outcome of the November 2020 election,</p> <p>21 you made the demonstrably false claims that 'the biggest</p> <p>22 fraud is the Dominion machines.'" Do you see that?</p> <p>23 A. Uh-huh.</p> <p>24 Q. And were you making accusations of Dominion</p> <p>25 regarding election fraud in December of 2020?</p>	<p style="text-align: right;">Page 343</p> <p>1 A. (Witness peruses document.) Hum, interesting.</p> <p>2 They were upset, it says here that --</p> <p>3 MR. KACHOUROFF: Well, just read it, and</p> <p>4 then she'll ask you questions about it.</p> <p>5 A. It says, "not to mention your considerable and</p> <p>6 costly efforts to bankroll an investigation into</p> <p>7 Dominion." They were upset about that. Huh. Okay.</p> <p>8 Q. (BY MS. WRIGLEY) And you see the second to</p> <p>9 last paragraph that stated, "With this letter, Dominion</p> <p>10 renews its demand you retract your defamatory</p> <p>11 accusations immediately and issue a public apology" --</p> <p>12 A. Yeah. Now I see that.</p> <p>13 Q. -- "for damaging Dominion's reputation with</p> <p>14 completely fabricated claims of fraud and corruption."</p> <p>15 A. Uh-huh.</p> <p>16 Q. "Dominion has been forced to expend substantial</p> <p>17 monetary sums to protect the health and safety of its</p> <p>18 employees following innumerable death threats from the</p> <p>19 social media mob that your statements have agitated</p> <p>20 against Dominion." Do you see that?</p> <p>21 A. Uh-huh.</p> <p>22 Q. And were you aware of this damage that Dominion</p> <p>23 claimed it was suffering from the campaign --</p> <p>24 A. And they were --</p> <p>25 MR. KACHOUROFF: Objection to the</p>
<p style="text-align: right;">Page 342</p> <p>1 A. Yeah, because I -- if you read a little</p> <p>2 further, it says, "All Dominion machines underwent</p> <p>3 certification, logic and accuracy testing before the</p> <p>4 election." They lied. They were not done in Arizona.</p> <p>5 Q. Now, this was the second letter you received</p> <p>6 from Dominion --</p> <p>7 A. Uh-huh. That was full of lies, so...</p> <p>8 Q. -- in January of 2021, correct?</p> <p>9 A. Yep.</p> <p>10 Q. Okay. And the letter identifies that you had</p> <p>11 publicly accused Dominion of election fraud, correct?</p> <p>12 A. That's correct.</p> <p>13 Q. And it refers to you undertaking a smear</p> <p>14 campaign, correct?</p> <p>15 A. That's what they were saying.</p> <p>16 Q. And in the letter, Dominion's lawyers informed</p> <p>17 you that your campaign was inflicting damage to the</p> <p>18 company's name and business operations, right?</p> <p>19 A. Well, no. I didn't see that. Is that in here</p> <p>20 somewhere? I didn't read this thing back then.</p> <p>21 Q. And if you go to the second to last full</p> <p>22 paragraph on Page 4 --</p> <p>23 MR. KACHOUROFF: Why don't you read the</p> <p>24 whole exhibit, Mr. Lindell.</p> <p>25 THE WITNESS: Okay. Yeah.</p>	<p style="text-align: right;">Page 344</p> <p>1 characterization of damage or that Dominion spent any</p> <p>2 more money that it typically would in association --</p> <p>3 A. Well, this is the first time I'm reading this,</p> <p>4 because I see on the next page it mentions their little</p> <p>5 witnesses, Katie Hobbs, Brad Raffensperger, Gabriel</p> <p>6 Sterling. Every one of these people now, three years</p> <p>7 later, I have evidence on every single one of them that</p> <p>8 they have committed some bad things. Every one of them</p> <p>9 lies. These are five lies right in a row, proven</p> <p>10 lies --</p> <p>11 Q. (BY MS. WRIGLEY) Sir --</p> <p>12 A. -- all five of them.</p> <p>13 Q. Mr. Lindell --</p> <p>14 A. But I never read it, because if I'd have read</p> <p>15 it back then, I would have pulled this out a long time</p> <p>16 ago.</p> <p>17 Q. Mr. Lindell, you're on Page 3, correct, with</p> <p>18 the bullet points?</p> <p>19 A. Yeah, Page 3 where they bring up Katie Hobbs,</p> <p>20 crooked Clint Hickman, Brad Raffensperger, the biggest</p> <p>21 blocker, corrupt Republican this country's ever seen.</p> <p>22 Q. Okay. So let me just walk through this.</p> <p>23 The first bullet point references a</p> <p>24 Republican from Maricopa County in Arizona, Clint</p> <p>25 Hickman, correct?</p>

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<p style="text-align: right;">Page 345</p> <p>1 A. Yes.</p> <p>2 Q. And he's --</p> <p>3 A. It says no evidence of fraud.</p> <p>4 Q. He's a fraudster based on your view of him?</p> <p>5 A. What's that?</p> <p>6 Q. You view him to be --</p> <p>7 MR. KACHOUROFF: Objection. Now you're</p> <p>8 being argumentative now. He never said he was a</p> <p>9 fraudster.</p> <p>10 Q. (BY MS. WRIGLEY) Do you view Maricopa County</p> <p>11 Board of Supervisors Chairman Clint Hickman --</p> <p>12 A. These -- these guys --</p> <p>13 Q. -- to have done something wrong, sir?</p> <p>14 A. Wait. Now, wait. Because he said that. It's</p> <p>15 a lie. Now it's a proven lie.</p> <p>16 Q. He's a liar?</p> <p>17 A. It's a -- he's a liar. Absolute liar. Either</p> <p>18 that or he's very misconstrued. One or the other.</p> <p>19 Either he didn't do his job as a supervisor and dig into</p> <p>20 it like I did, or he's a liar. It's only one of the</p> <p>21 two. Either you're a liar or you didn't do the due</p> <p>22 diligence you should have done.</p> <p>23 Why should a guy have to go out and do all</p> <p>24 this due diligence for the whole country? These guys</p> <p>25 should have done their own due diligence there. So he's</p>	<p style="text-align: right;">Page 347</p> <p>1 And based on what I know, not on hearsay. I got more on</p> <p>2 Brad Raffensperger than anyone in the country. He</p> <p>3 should be in prison. When we melt down these machines,</p> <p>4 he will be the first one behind bars, trust me.</p> <p>5 Terrible guy.</p> <p>6 Q. Okay. And in this letter, do you see that it</p> <p>7 refers to a lawsuit that --</p> <p>8 A. I've never read this entirely.</p> <p>9 Q. -- was filed by -- against Sidney Powell by</p> <p>10 Dominion?</p> <p>11 A. I've never read this till right now, seriously.</p> <p>12 Never read this in my life.</p> <p>13 Q. All right. I'm going to show you another</p> <p>14 document, and this is going to be 629, for the record.</p> <p>15 (Exhibit 629 marked.)</p> <p>16 MS. WRIGLEY: This is Exhibit 629.</p> <p>17 MR. KACHOUROFF: Thank you.</p> <p>18 Q. (BY MS. WRIGLEY) Do you recognize this</p> <p>19 document, sir?</p> <p>20 A. Yeah. You just gave me the same document.</p> <p>21 Q. Do you see on the first page, it looks like you</p> <p>22 forward it to yourself on March 27, 2021?</p> <p>23 A. What's that now?</p> <p>24 Q. On the first page, it's an -- there's an E-mail</p> <p>25 at the top. Do you see that?</p>
<p style="text-align: right;">Page 346</p> <p>1 a liar.</p> <p>2 Q. How about Arizona Secretary of State, Katie</p> <p>3 Hobbs?</p> <p>4 A. She's as crooked as the day is long.</p> <p>5 Q. Got it.</p> <p>6 A. She -- we have more stuff on her crimes and</p> <p>7 probably more than Janet Griswold from Colorado.</p> <p>8 Q. And then if I go down a little bit, there's a</p> <p>9 Gabriel Sterling, who's a voting systems implementation</p> <p>10 manager in --</p> <p>11 A. Yeah. Him and Raffensperger. If you're a</p> <p>12 Democrat in Georgia, don't come our way. Georgia's so</p> <p>13 corrupt, and Brad Raffensperger is the -- he's the --</p> <p>14 probably the worst blocker in the country. I call that</p> <p>15 a deviation.</p> <p>16 Why wouldn't Brad have wanted to look into</p> <p>17 it? He hid the Curling case for three and a half years.</p> <p>18 He didn't even testify in -- this January when they</p> <p>19 needed him to testify. Why didn't you testify, Brad?</p> <p>20 Q. And so you're referring to the Secretary -- the</p> <p>21 Georgia Secretary of State Brad Raffensperger. You</p> <p>22 think he's involved with wrongdoing, sir?</p> <p>23 A. Wrong with what?</p> <p>24 Q. Involved in wrongdoing?</p> <p>25 A. A hundred percent. It's not even a question.</p>	<p style="text-align: right;">Page 348</p> <p>1 A. Yeah, because I -- I -- this is -- this is the</p> <p>2 only one I actually read. Because you see where I</p> <p>3 forwarded M Lindell? I never use that E-mail. I use</p> <p>4 Mike@MyPillow for every single conversation I ever had,</p> <p>5 no matter what company it is or what it is. So I must</p> <p>6 have found that in the M Lindell and I forwarded it to</p> <p>7 myself. This is actually one I read.</p> <p>8 Q. And you read this letter from Dominion's</p> <p>9 lawyers?</p> <p>10 A. This one right here.</p> <p>11 Q. Yes.</p> <p>12 A. The other two I probably hadn't even seen. I</p> <p>13 know I've never seen this one before.</p> <p>14 Q. But 629 is the same as the letter in 628,</p> <p>15 correct, that we just looked at?</p> <p>16 A. "We write you again..."</p> <p>17 Oh. So this is the same one I just</p> <p>18 E-mailed to myself.</p> <p>19 Q. And you --</p> <p>20 A. That's when I read it then. I would have first</p> <p>21 read it on March 27th of 2021.</p> <p>22 Q. But you had -- you did read this letter from</p> <p>23 Dominion's lawyers, correct?</p> <p>24 A. Then I must have read it on March 27th of 2021.</p> <p>25 Because if I E-mailed it to my real E-mail, I would have</p>

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<p style="text-align: right;">Page 349</p> <p>1 read it.</p> <p>2 Q. I'm going to hand you Exhibit 630, sir.</p> <p>3 (Exhibit 630 marked.)</p> <p>4 Q. (BY MS. WRIGLEY) Do you recognize this</p> <p>5 document? For the record, it's --</p> <p>6 A. No.</p> <p>7 Q. -- DEF 004727. It has an attachment 4728 with</p> <p>8 11 pages for the attachment.</p> <p>9 MR. KACHOUROFF: Sorry. What number?</p> <p>10 MS. WRIGLEY: 630.</p> <p>11 Q. (BY MS. WRIGLEY) Do you see on the first page</p> <p>12 you forwarded it to yourself?</p> <p>13 A. Yeah.</p> <p>14 Q. And you forwarded it on February 5th, 2021?</p> <p>15 A. Okay.</p> <p>16 Q. Do you see that, sir?</p> <p>17 A. Yeah.</p> <p>18 Q. And that would have been the date of "Absolute</p> <p>19 Proof," correct?</p> <p>20 A. Yeah.</p> <p>21 Q. And if you look at the attachment, this is</p> <p>22 another letter from Dominion's lawyers, correct?</p> <p>23 A. Right. I know I didn't read this one because I</p> <p>24 was a little busy that day.</p> <p>25 Q. Is this the one you called the Mafia letter,</p>	<p style="text-align: right;">Page 351</p> <p>1 percent proof of your false claims, but you have never</p> <p>2 produced any real evidence because it doesn't exist."</p> <p>3 Do you see that?</p> <p>4 A. Uh-huh.</p> <p>5 Q. And Dominion indicated to you that at least it</p> <p>6 asserted that your claims about the election being</p> <p>7 stolen were false, correct?</p> <p>8 A. They're claiming that I'm doing it to make</p> <p>9 money, when at this point when this letter was written,</p> <p>10 I had already lost \$150 million in about two months.</p> <p>11 Q. Now, the second paragraph says, "Recently, you</p> <p>12 announced your intention to release a documentary with</p> <p>13 evidence of your false claims about Dominion. We write</p> <p>14 to put you on formal notice of facts so that there is</p> <p>15 absolutely no doubt at a future date about what was</p> <p>16 known to you before you publish that documentary."</p> <p>17 A. Uh-huh.</p> <p>18 Q. Do you see that?</p> <p>19 A. Yep.</p> <p>20 MR. KACHOUROFF: Yeah, I'm going to object</p> <p>21 to this letter as hearsay, and the notion that it</p> <p>22 contains facts is debatable.</p> <p>23 Q. (BY MS. WRIGLEY) And were you aware of this</p> <p>24 formal notice that Dominion's lawyers sent to you on</p> <p>25 Novem -- February 4th, 2021?</p>
<p style="text-align: right;">Page 350</p> <p>1 sir?</p> <p>2 A. No. The Mafia letter is one almost 200 and</p> <p>3 some people got, and it's threatening them. A lot of</p> <p>4 them went out and got home security systems and stuff.</p> <p>5 They were very scared by Dominion. It was almost don't</p> <p>6 talk.</p> <p>7 And we had over -- I think over -- it was a</p> <p>8 lawsuit that we -- I actually hired Alan Dershowitz and</p> <p>9 another lawyer for it that we -- to sue -- no, went</p> <p>10 after Dominion, and they sent all these threatening</p> <p>11 letters to all these people. I don't know where it</p> <p>12 ended up, but it was mostly in Michigan. We had --</p> <p>13 they -- it was hundreds of people.</p> <p>14 Q. Now, looking at the first page of this letter,</p> <p>15 February 4th, 2021, which you forwarded to yourself on</p> <p>16 the 5th of February, that first paragraph states, "For</p> <p>17 months, you have been lying about Dominion in order to</p> <p>18 financially enrich yourself and MyPillow, Inc. by</p> <p>19 selling more MyPillow products to Trump supporters who</p> <p>20 tuned or attended rallies because they wanted to hear</p> <p>21 that the election was stolen" -- "had been stolen and</p> <p>22 that Trump would have another term in office. In</p> <p>23 support of your defamatory marketing campaign, which we</p> <p>24 understand has boosted your sales considerably, you have</p> <p>25 repeatedly claimed to have evidence and a hundred</p>	<p style="text-align: right;">Page 352</p> <p>1 A. This is -- I do -- I definitely read this one</p> <p>2 because this is the one where they said don't you put</p> <p>3 anything in there about Sidney Powell, or how about</p> <p>4 Rudy. And I'm going, you know, if they're telling me</p> <p>5 this documentary better not include that, I have Dennis</p> <p>6 Montgomery's evidence that I had -- it had all been</p> <p>7 validated. So this is all -- I looked at that and went</p> <p>8 boy, aren't you going to be in for a surprise, Dominion.</p> <p>9 Q. Do you see that it says in the last two</p> <p>10 sentences of that paragraph, "These people lack any</p> <p>11 relevant expertise about voting machines and election</p> <p>12 security, and they are determined to promote a false,</p> <p>13 preconceived narrative about the 2020 election. In</p> <p>14 light of this, you are well aware that there are</p> <p>15 countless people willing to put forward fake evidence of</p> <p>16 fraud in the 2020 election, and that any evidence must,</p> <p>17 therefore, be carefully scrutinized for liability before</p> <p>18 you choose to broadcast it to a global Internet</p> <p>19 audience"? Do you see that?</p> <p>20 A. What -- yeah.</p> <p>21 Q. And would you have agreed that it would be</p> <p>22 important to carefully scrutinize evidence for --</p> <p>23 A. I did.</p> <p>24 Q. -- reliability?</p> <p>25 A. I did. I bet my life on --</p>

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<p style="text-align: right;">Page 353</p> <p>1 Q. And you --</p> <p>2 A. I did my due diligence, and I'm still betting</p> <p>3 my life on it.</p> <p>4 Q. You carefully scrutinized --</p> <p>5 A. I'm a hundred percent right.</p> <p>6 Q. -- Dennis Montgomery, sir?</p> <p>7 A. What?</p> <p>8 Q. You carefully scrutinized Dennis Montgomery?</p> <p>9 A. A hundred percent.</p> <p>10 Q. And you carefully scruti --</p> <p>11 A. I put my whole life on the line. I lost</p> <p>12 everything because of it. And then Dominion's sitting</p> <p>13 there going, oh, you -- I could have sat back. I was a</p> <p>14 millionaire. Every dime's been spent now. Every dime</p> <p>15 trying to save our country, every single dime. I got</p> <p>16 one house, a \$6 million lien against it by the IRS.</p> <p>17 Q. So --</p> <p>18 A. So don't -- and I still keep fighting for our</p> <p>19 country.</p> <p>20 Q. On Page 2, sir, the next section is titled</p> <p>21 "Despite knowing your claims about Dominion are false,</p> <p>22 you doubled down on your smear campaign and promoted</p> <p>23 fabricated evidence to support your accusations."</p> <p>24 MR. KACHOUROFF: Objection to the extent</p> <p>25 you're --</p>	<p style="text-align: right;">Page 355</p> <p>1 A. I just reTweeted it.</p> <p>2 Q. Okay.</p> <p>3 A. I just reTweeted it.</p> <p>4 Q. And do you recognize that being an article that</p> <p>5 Mary Fanning wrote?</p> <p>6 A. No. But it says "The American Report</p> <p>7 exclusive." And that must have -- I think that was her</p> <p>8 website. I don't know. But this is my Twitter account.</p> <p>9 I reTweeted that. It was out there. And I don't know</p> <p>10 what day that was reTweeted.</p> <p>11 Q. Well, Dominion specifically --</p> <p>12 A. January 11th. January 11th. It says, "Mary</p> <p>13 Fanning and Alex Jones."</p> <p>14 Q. Okay. Let me ask you a question, sir. On</p> <p>15 Page 2 in that second paragraph, Dominion specifically</p> <p>16 identifies this Tweet by you that includes an article by</p> <p>17 Mary Fanning, correct?</p> <p>18 A. Say that again.</p> <p>19 Q. Paragraph 2 --</p> <p>20 A. Yeah.</p> <p>21 Q. -- on Page 2 of this Dominion letter to you</p> <p>22 specifically identifies a Tweet that included an article</p> <p>23 that you received from Mary Fanning, correct?</p> <p>24 A. It looks -- yes.</p> <p>25 Q. And you Tweeted that out, correct, yourself?</p>
<p style="text-align: right;">Page 354</p> <p>1 A. They've got some nuts over there.</p> <p>2 MR. KACHOUROFF: -- argumentative. This is</p> <p>3 all argument. He never said that.</p> <p>4 A. You can't -- you can't show me that. Stop</p> <p>5 saying that. I didn't say anything false. I said</p> <p>6 nothing false, at all. Despite knowing your claims are</p> <p>7 false. I would never say a false claim about them if I</p> <p>8 didn't do my due diligence and I know it's true.</p> <p>9 Q. (BY MS. WRIGLEY) Now, part of your due</p> <p>10 diligence was going to look at articles written on the</p> <p>11 American Report Blog, correct?</p> <p>12 A. On what?</p> <p>13 Q. The American Report Blog?</p> <p>14 A. I don't know American Report Blog.</p> <p>15 Q. Are you not familiar with the name of that</p> <p>16 blog, sir?</p> <p>17 A. I don't know what American Report Blog is.</p> <p>18 Q. Do you see on the -- in the second paragraph on</p> <p>19 the first page it says, "Purposely disregarding the</p> <p>20 paper" --</p> <p>21 A. That was from Mary Fanning. That was a -- that</p> <p>22 was a printout from Mary Fanning.</p> <p>23 Q. That was in your --</p> <p>24 A. This was on Twitter.</p> <p>25 Q. -- social media post?</p>	<p style="text-align: right;">Page 356</p> <p>1 A. Uh-huh.</p> <p>2 Q. And the article is "Exclusive: Proof China,</p> <p>3 Russia Hacked 2020 Election."</p> <p>4 A. That's correct.</p> <p>5 Q. "IP Addresses In China, Russia, Hong Kong,</p> <p>6 Germany, Canada, Czech Republic Hacked PA, NV, MI, GA</p> <p>7 Battleground States Raw Data Analytics" -- "Raw Data</p> <p>8 Analytics Show." Do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. That is the proof Mary Fanning gave you --</p> <p>11 A. No, it's not. Not at all. That's just the</p> <p>12 thing I reTweeted on January 11th. That's not the proof</p> <p>13 she gave me.</p> <p>14 Q. That article is not the proof that she gave</p> <p>15 you?</p> <p>16 A. No.</p> <p>17 Q. Well, if you go to Page 3, do you see that</p> <p>18 Dominion goes on to discuss and attack the reliability</p> <p>19 of information presented in that article?</p> <p>20 A. Good for her. I -- she -- I didn't even</p> <p>21 know -- that's just an article I reTweeted.</p> <p>22 Q. You wouldn't have disregarded the information</p> <p>23 Dominion provided you in this letter?</p> <p>24 A. What's that?</p> <p>25 Q. Would you have disregarded the information that</p>

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<p style="text-align: right;">Page 357</p> <p>1 Dominion provided to you in this letter?</p> <p>2 A. What Dominion -- no matter what Dominion gave</p> <p>3 me, I already got my evidence when this -- when they</p> <p>4 sent this on January 9th. Nothing was going to change</p> <p>5 my mind. I had done my due diligence for two months.</p> <p>6 I knew that you had to explain all these</p> <p>7 people that voted. It's impossible to do it with</p> <p>8 people. You had to use computers. There's no other way</p> <p>9 around it. It's mathematically impossible.</p> <p>10 If I stood before you and showed you all 50</p> <p>11 states and how many -- and every state and county in the</p> <p>12 United States, everyone had residents that voted that</p> <p>13 didn't -- and they're -- and people that were deceased,</p> <p>14 you can't explain it to me. I could because of Hammer</p> <p>15 Scorecard, because of the machines. You can't explain</p> <p>16 it any other way.</p> <p>17 Q. Mr. Lindell, can I direct your attention to</p> <p>18 Page 4, please. Do you see this on Page 4, Dominion's</p> <p>19 letter has a section titled "Proven liars. Conspiracy</p> <p>20 theorists and nonexperts are not reliable sources of</p> <p>21 information"? Do you see that?</p> <p>22 A. Where does it say that?</p> <p>23 Q. Page 4, section 2.</p> <p>24 A. I'm on 4.</p> <p>25 Q. Do you see that, sir?</p>	<p style="text-align: right;">Page 359</p> <p>1 had to get it signed or he could not put it all out</p> <p>2 there. You guys have the 32 terabytes now. But it's</p> <p>3 still under a gag order.</p> <p>4 I could not put that out there. I was</p> <p>5 under a gag order. You can't put it out there. I know</p> <p>6 it's real, but I can't put it out there.</p> <p>7 Mary's little American Report, whatever was</p> <p>8 on there, I'd have to look back to see what they're</p> <p>9 talking about.</p> <p>10 Q. (BY MS. WRIGLEY) Sir, now, going back to the</p> <p>11 Dominion letter you received on Page 4, do you see that</p> <p>12 it goes on, starting at the bottom with Russell Ramsland</p> <p>13 and lists a number of experts that it claims are</p> <p>14 unreliable?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Is that -- is that a "yes," sir?</p> <p>17 A. What's that now?</p> <p>18 Q. I'm sorry, what?</p> <p>19 A. What's that -- what was your question?</p> <p>20 Q. Going back to the Dominion letter you</p> <p>21 received --</p> <p>22 A. Yeah.</p> <p>23 Q. -- on Page 4 at the bottom, do you see that it</p> <p>24 goes on to list a number of people that it claims are</p> <p>25 unreliable, starting with Russell Ramsland?</p>
<p style="text-align: right;">Page 358</p> <p>1 A. Uh-huh.</p> <p>2 Q. The paragraph states out, "Despite constantly</p> <p>3 stating that you have done your due diligence and seen</p> <p>4 the evidence yourself, the only evidence you have ever</p> <p>5 delivered is the nonsensical and spatially unreliable</p> <p>6 American Report." Do you see that?</p> <p>7 A. Uh-huh.</p> <p>8 Q. And you understand The American Report is a</p> <p>9 site run by Mary Fanning, correct?</p> <p>10 A. That's what these guys are putting that I had</p> <p>11 Tweeted. I had not stuck out information. What I was</p> <p>12 trying to do -- here's what you're missing here --</p> <p>13 MR. KACHOUROFF: Well, Mike, let her ask</p> <p>14 the question.</p> <p>15 MS. WRIGLEY: Yeah.</p> <p>16 THE WITNESS: No, because I -- I'm going to</p> <p>17 answer the question.</p> <p>18 MR. KACHOUROFF: No. I'm going to ask --</p> <p>19 you'll get a chance. I'll clean it up.</p> <p>20 THE WITNESS: She asked me about The</p> <p>21 American Report.</p> <p>22 A. That wasn't my image. Dominion was</p> <p>23 misconstrued. I didn't put the evidence out there</p> <p>24 because of one reason. Dennis Montgomery had a gag</p> <p>25 order on him that had to be signed by the President. He</p>	<p style="text-align: right;">Page 360</p> <p>1 A. You know -- you know what I see right above</p> <p>2 that? Dominion says you're going to -- you plan on</p> <p>3 putting out this documentary, and it -- and you plan to</p> <p>4 feature your glorified MyPillow infomercial. I never</p> <p>5 put a commercial in that thing. So they're already</p> <p>6 putting lies there. It's like they're -- I don't know</p> <p>7 what they were doing.</p> <p>8 Q. Well, let me get back to this list, sir.</p> <p>9 A. And all these -- Russell Ramsland. So I'm</p> <p>10 seeing names here.</p> <p>11 Q. Okay. Russell Ramsland is --</p> <p>12 A. Russell Ramsland.</p> <p>13 Q. -- is number one, right?</p> <p>14 A. Now, Russell Ramsland --</p> <p>15 Q. Let me ask the question, sir.</p> <p>16 A. Yeah.</p> <p>17 Q. Okay?</p> <p>18 A. Okay.</p> <p>19 Q. The first one listed here is Russell Ramsland,</p> <p>20 correct?</p> <p>21 A. They just put Russell Ramsland.</p> <p>22 Q. Okay.</p> <p>23 A. But I knew about Russell Ramsland.</p> <p>24 Q. Okay. And did you understand when you got this</p> <p>25 letter from Dominion that Dominion was saying these</p>

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<p style="text-align: right;">Page 361</p> <p>1 people were not reliable?</p> <p>2 A. Right. Dominion lied, because I already knew</p> <p>3 that about Russell.</p> <p>4 Q. You did not believe Dominion; is that right?</p> <p>5 A. Not Russell Ramsland, because you know why? I</p> <p>6 had done my due diligence on that. He was in charge of</p> <p>7 the Antrim County, Michigan investigation, and the State</p> <p>8 of Texas had used him as a -- to say -- to -- as an</p> <p>9 investigation. This is his world. They're called -- I</p> <p>10 forget what the name of their company is. They've been</p> <p>11 in business for 20 years in Texas.</p> <p>12 Q. ASOG?</p> <p>13 A. ASOG.</p> <p>14 They -- they talk -- or they -- in the</p> <p>15 State of Texas, I think it was Paxton, Attorney General,</p> <p>16 they showed him, hey, Dominion machines are vulnerable,</p> <p>17 whatever, and they got rid of Dominion machines because</p> <p>18 of Ramsland. Ramsland was involved in the investigation</p> <p>19 into Antrim County, Michigan. I know what they did to</p> <p>20 that investigation.</p> <p>21 THE COURT REPORTER: Will you please slow</p> <p>22 down?</p> <p>23 Q. (BY MS. WRIGLEY) Yes.</p> <p>24 A. I knew what they did to that investigation. So</p> <p>25 right there, I knew, oh, they're discrediting Russell</p>	<p style="text-align: right;">Page 363</p> <p>1 A. I probably read part of it.</p> <p>2 Q. -- rigging the election, sir?</p> <p>3 A. I -- I never -- I know I never read it because</p> <p>4 I've never seen Dennis Montgomery's name on here.</p> <p>5 This -- I probably read the first part.</p> <p>6 Was this an attachment? Was this an</p> <p>7 attachment?</p> <p>8 Q. It was an attachment to the E-mail.</p> <p>9 A. I never read the attachment. I probably read</p> <p>10 the opening thing.</p> <p>11 Q. Let me ask you this: You disregarded this</p> <p>12 letter from Dominion's lawyers before you put "Absolute</p> <p>13 Proof" out?</p> <p>14 A. Absolutely, because this was read -- this was</p> <p>15 forwarded to me when? This came to me on February 5th.</p> <p>16 "Absolute Proof" was already out.</p> <p>17 Q. And --</p> <p>18 A. And what?</p> <p>19 Q. -- even though you knew you were about to</p> <p>20 accuse, in "Absolute Proof," Dominion of rigging the</p> <p>21 2020 election?</p> <p>22 MR. KACHOUROFF: Objection. That's</p> <p>23 argumentative.</p> <p>24 A. Even though I knew what?</p> <p>25 MR. KACHOUROFF: He indicated the machines</p>
<p style="text-align: right;">Page 362</p> <p>1 Ramsland? Wrong. Because I did my own due diligence on</p> <p>2 him.</p> <p>3 Q. Now, Mr. --</p> <p>4 A. So they were liars.</p> <p>5 Q. Mr. Russell Ramsland was deposed in this case.</p> <p>6 Are you aware of that?</p> <p>7 A. No.</p> <p>8 Q. Do you know whether he took the Fifth in that</p> <p>9 deposition?</p> <p>10 A. I have no idea what Russ Ramsland did. Did he?</p> <p>11 Q. I'm asking you if you know, sir?</p> <p>12 A. I have no idea. I knew Flynn did, because I</p> <p>13 was very upset. He should have told you everything</p> <p>14 about Hammer Scorecard, about your company.</p> <p>15 Q. And let me -- I want to jump ahead to another</p> <p>16 individual listed in this Dominion letter on Page 9. Do</p> <p>17 you see that Dennis Montgomery is listed here?</p> <p>18 A. You realize I've never read this, right, ever?</p> <p>19 Q. But Mr. Lindell, you forwarded it to yourself,</p> <p>20 correct?</p> <p>21 A. I forwarded it, but this was on February 5th.</p> <p>22 If you knew what I did on February 5th, I didn't have</p> <p>23 time to read this.</p> <p>24 Q. You disregarded this legal letter from Dominion</p> <p>25 before you were accused them of --</p>	<p style="text-align: right;">Page 364</p> <p>1 did it, were used to rig the election.</p> <p>2 A. Even though I knew what?</p> <p>3 Q. (BY MS. WRIGLEY) Even though you knew that you</p> <p>4 were about to accuse Dominion of rigging the 2020</p> <p>5 election in "Absolute Proof"?</p> <p>6 A. If I'd have seen this before then, I would have</p> <p>7 put it out. I knew what I knew on it. It's a hundred</p> <p>8 percent.</p> <p>9 Q. So let's look --</p> <p>10 A. They did it.</p> <p>11 Q. Let's look at Page 9, sir.</p> <p>12 A. Huh?</p> <p>13 Q. Stay with me on Page 9 in the section on --</p> <p>14 (Crosstalk.)</p> <p>15 A. I mean, this is a hundred percent.</p> <p>16 Q. (BY MS. WRIGLEY) Okay. Do you see number</p> <p>17 seven is Dennis Montgomery?</p> <p>18 A. Yeah.</p> <p>19 Q. And let's try to slow down because she's</p> <p>20 getting frustrated with the two of us.</p> <p>21 A. Uh-huh.</p> <p>22 Q. Dominion writes about Mr. Montgomery on Page 9.</p> <p>23 Do you see that?</p> <p>24 A. Yep.</p> <p>25 Q. Dominion says, "Dennis Montgomery is a</p>

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<p style="text-align: right;">Page 365</p> <p>1 fraudster known for pulling off one of the most</p> <p>2 elaborate and dangerous hoaxes in American history after</p> <p>3 he tricked the federal government into paying millions</p> <p>4 of dollars for bogus terrorist detection software." Do</p> <p>5 you see that? Do you know whether that's true or not?</p> <p>6 A. It's not true.</p> <p>7 Q. How do you know?</p> <p>8 A. Because I know. I've done the due diligence.</p> <p>9 I've talked to the people in the government, the people</p> <p>10 that paid him. His paychecks. What do you mean?</p> <p>11 Q. Who did you talk to in the government, sir?</p> <p>12 A. General Flynn McInerney, Colonel Waldron. The</p> <p>13 people -- the people -- and you can validate. Sean</p> <p>14 Hannity did a big investigation --</p> <p>15 Q. Sean Hannity is going to vouch for Dennis</p> <p>16 Montgomery, sir?</p> <p>17 A. He won't any more because he's afraid of all</p> <p>18 you guys. He won't any more, but he sure did on his</p> <p>19 show in 2017. Dennis Montgomery was the biggest</p> <p>20 thing -- discovery ever.</p> <p>21 Q. So you're relying upon Sean Hannity --</p> <p>22 A. And it's -- and I will tell you this --</p> <p>23 Q. -- for --</p> <p>24 A. -- when it says here about -- I'm sorry.</p> <p>25 Q. You're relying upon information --</p>	<p style="text-align: right;">Page 367</p> <p>1 Q. So --</p> <p>2 A. So, no, I did that. And I will tell you this,</p> <p>3 in 2009, he was charged with obtaining money under false</p> <p>4 pretenses and to pay Caesars Palace --</p> <p>5 THE COURT REPORTER: Will you please slow</p> <p>6 down?</p> <p>7 A. -- to pay Caesars Palace for bad checks.</p> <p>8 I was an ex-crack addict. Does that make</p> <p>9 what I say not truthful?</p> <p>10 I mean, is -- you know,</p> <p>11 Dennis Montgomery --</p> <p>12 Q. (BY MS. WRIGLEY) Mr. Lindell --</p> <p>13 A. -- if any of this is true about his Caesars</p> <p>14 Palace, it has nothing to do -- evidence is evidence.</p> <p>15 You -- it doesn't matter who brings you the evidence.</p> <p>16 If I say this is a coffee cup and you</p> <p>17 brought it to me, that's a coffee cup. I don't care</p> <p>18 what your past is. Is this a coffee cup or not?</p> <p>19 Dennis Montgomery has -- was a hundred</p> <p>20 percent evidence. Hammer Scorecard is real. He had a</p> <p>21 contract with the government. They --</p> <p>22 THE COURT REPORTER: Can you please slow</p> <p>23 down?</p> <p>24 Q. (BY MS. WRIGLEY) Yes, Mr. Lindell --</p> <p>25 A. -- and they paid him millions of dollars.</p>
<p style="text-align: right;">Page 366</p> <p>1 MR. KACHOUROFF: Objection.</p> <p>2 Q. (BY MS. WRIGLEY) -- from Sean Hannity in</p> <p>3 assessing the credibility of Dennis Montgomery?</p> <p>4 MR. KACHOUROFF: Objection.</p> <p>5 A. No.</p> <p>6 MR. KACHOUROFF: That's not his testimony.</p> <p>7 A. Absolutely not. That was -- I think it was</p> <p>8 public. They did an investigation into you. I've seen</p> <p>9 that. I've seen that investigation.</p> <p>10 I did my own thing. I lived and breathed</p> <p>11 Dennis Montgomery for three years, hundred percent,</p> <p>12 hundred percent.</p> <p>13 Q. (BY MS. WRIGLEY) And just so we're clear, in</p> <p>14 terms of doing your own thing in assessing the</p> <p>15 credibility of Dennis Montgomery, that includes speaking</p> <p>16 with General Flynn, Colonel Waldron, General McInerney</p> <p>17 and doing Internet research, correct, sir?</p> <p>18 A. No. And say -- and having Dennis himself give</p> <p>19 me all his credentials. I bought into his company,</p> <p>20 Bixware. I owned part of Bixware or all of it. I</p> <p>21 bought into his company. We went all the way back, when</p> <p>22 the company was formed, what the government paid him,</p> <p>23 all the E-mails going back and forth with the</p> <p>24 government. He worked there for like 15, 20 years for</p> <p>25 the CIA. I got his whole war chest in front of me.</p>	<p style="text-align: right;">Page 368</p> <p>1 MR. KACHOUROFF: Slow down. Okay?</p> <p>2 Q. (BY MS. WRIGLEY) -- please, please slow down.</p> <p>3 A. They paid him millions of dollars.</p> <p>4 MR. KACHOUROFF: You're asking him -- just</p> <p>5 objection here. You've sandbagged him with this letter.</p> <p>6 MS. WRIGLEY: I do -- let's -- let's be</p> <p>7 clear. I'm trying to ask him some questions, but he's</p> <p>8 testifying --</p> <p>9 MR. KACHOUROFF: I realize that -- I --</p> <p>10 MS. WRIGLEY: -- unprompted --</p> <p>11 MR. KACHOUROFF: Well, I realize that he --</p> <p>12 MS. WRIGLEY: -- whatever he wants.</p> <p>13 MR. KACHOUROFF: But you -- you pull out a</p> <p>14 letter he doesn't --</p> <p>15 MS. WRIGLEY: A letter he received, sir.</p> <p>16 MR. KACHOUROFF: Okay. What I'm going to</p> <p>17 do is instruct my client now to read the entire</p> <p>18 letter --</p> <p>19 MS. WRIGLEY: That's fine.</p> <p>20 MR. KACHOUROFF: -- from Page 1 to Page 9.</p> <p>21 MS. WRIGLEY: Let's go off the record and</p> <p>22 take a break.</p> <p>23 MR. KACHOUROFF: No. We're staying on the</p> <p>24 record for this. It's your exhibit.</p> <p>25 MS. WRIGLEY: He can do that. We can stop</p>

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<p style="text-align: right;">Page 369</p> <p>1 the record and he can come back and review it when we 2 come back on. 3 MR. KACHOUROFF: If you want to take break, 4 we'll take a break. 5 MS. WRIGLEY: Yeah. I don't even think 6 there's a question pending at this point. He's just 7 been talking at length unpromptedly about whatever he 8 feels like. 9 MR. KACHOUROFF: And I -- just so you know, 10 it's going both ways. That's the way I look at it. 11 MS. WRIGLEY: I've been trying to ask him 12 some questions, but he's -- 13 MR. KACHOUROFF: Okay. 14 MS. WRIGLEY: -- answering whatever 15 question he feels like answering. 16 MR. KACHOUROFF: All right. We're off the 17 record, right? 18 THE VIDEOGRAPHER: We're going off the 19 record at 3:50. 20 (Short recess.) 21 THE VIDEOGRAPHER: Okay. We're back on the 22 record at 4:04. 23 THE WITNESS: On the question she was 24 asking -- 25 MR. KACHOUROFF: Don't worry about it.</p>	<p style="text-align: right;">Page 371</p> <p>1 Q. Yes. Do you see this is an E-mail chain that 2 ends on January 1st, 2021? 3 A. Uh-huh. 4 Q. And at the very top on the first page, do you 5 see it's an E-mail forwarded to you from Scott Hennen 6 with the subject "Forward. Wake up Kevin Cramer"? Do 7 you see that? 8 A. Yes. 9 Q. Now, who is Scott Hennen? 10 A. Scott Hennen runs a radio program in North 11 Dakota, and he's friends with Senator Cramer. 12 Q. Okay. And who is Kevin Cramer, sir? 13 A. He's a senator. 14 Q. What state is Kevin Cramer a senator in? 15 A. North Dakota. 16 Q. Kevin Cramer is the senator of North Dakota? 17 A. (Witness indicated by nodding his head 18 affirmatively.) 19 Q. Okay. And Mr. Hennen forwarded you an E-mail 20 stating, "For your eyes only. Please keep this 21 confidential, but it will help you understand Kevin's 22 thinking as we pray for him and attempt to get him where 23 you, Kendra and I are." Do you see that? 24 A. Uh-huh. 25 Q. And he forwarded an E-mail to you that he</p>
<p style="text-align: right;">Page 370</p> <p>1 Don't worry about it. 2 THE WITNESS: I'm just telling you. 3 MR. KACHOUROFF: Okay. 4 THE WITNESS: It was the time -- the date, 5 okay -- 6 MR. KACHOUROFF: Yeah, don't worry about 7 it. Don't worry about it. 8 Q. (BY MS. WRIGLEY) Okay. Mr. Lindell, I'm done 9 with 630 for -- for now. That was the letter from 10 Dominion. 11 A. Okay. 12 Q. Okay. Why don't we move on, and I'll show you 13 another exhibit, 631. 14 (Exhibit 631 marked.) 15 Q. (BY MS. WRIGLEY) Mr. Lindell, looking at 631, 16 do you see this an E-mail chain from -- and it's got a 17 number of E-mails in it, but it has a chain that ends on 18 January 1st, 2021. 19 And for the record, it's DEF 019282, and it 20 has four pages. 21 Do you see at the top on the first page, 22 sir? 23 A. What's that? Who's what? 24 Q. In the -- at the very top -- 25 A. Scott. Scott Hennen.</p>	<p style="text-align: right;">Page 372</p> <p>1 received from Kevin Cramer, correct? 2 A. I guess. I've never -- I have never read this. 3 Q. It was sent to your MyPillow.com E-mail 4 address. Do you see that? 5 A. Yes. 6 Q. And you don't remember -- 7 A. Do you guys -- do you realize how many -- let 8 me tell you how many E-mails I read out of a thousand 9 E-mails a week, maybe two -- 10 Q. Well -- 11 A. -- just so you know that. 12 Q. -- let's -- let me walk -- let me walk through 13 this. 14 A. And the reason I know I never read this, I 15 wouldn't even read all this. I mean, this is a long 16 E-mail. I wouldn't have took the time to read it. I 17 would have called Kevin up or I would have called Scott 18 up and say what's the gist of this? That's what I would 19 do. I get people on the phone. I'm not going to 20 read -- sit here and read all this nonsense. Blah, 21 blah, blah, blah, blah. 22 Q. Well, let's look at what the E-mail did 23 contain. Look at Page 1. Do you see that the -- Kevin 24 Cramer wrote an E-mail to Scott Hennen in the chain on 25 January 1st, 2021? Do you see that, sir?</p>

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<p style="text-align: right;">Page 373</p> <p>1 A. "I appreciate my lawyers are doing everything 2 else, looking into every accusation and response." 3 Q. Do you see that, sir? 4 A. Uh-huh. 5 Q. Okay. The second paragraph says, "Remember, 6 Georgia has two GOP U.S. senators, a Republican governor 7 and secretary of state. Pennsylvania has one of the 8 most conservative senators in America, who nominated one 9 of the most conservative federal judges in America" -- 10 A. Uh-huh. 11 Q. -- "and an appellate judge appointed by G" -- 12 "DJP. They aren't" -- 13 A. Right. 14 Q. -- "lightweights in any legal fight, and they 15 not only reject the Trump allegations, but have blown 16 them out of the water in PA. Wisconsin has one of the 17 toughest, most conservative pro-Trump senators who has 18 held hearings on this stuff, and not even he is 19 convinced. Like me, he believes there were a lot of 20 abuses of the mail-in ballot situation allowed by many 21 states, but is still waiting for real evidence." Do you 22 see that? 23 A. Uh-huh. 24 Q. He continues, "But we still dig in and remain 25 open. But my default is not to vote to disenfranchise</p>	<p style="text-align: right;">Page 375</p> <p>1 survive without Donald Trump. If he loaded the ballot 2 boxes in California with Republican mail-in votes by 3 dead people and won, none of them would be concerned, 4 and I would be" -- "would be yelling at me to defend 5 Trump. I love the guy, but not as much as I love 6 America." Do you see that? 7 A. Uh-huh. 8 Q. And he continues. "The irony is the easiest 9 thing for me to do politically would be to object to 10 every elector in swing states and vote to not count the 11 ballots. It would be hard for me to defend the 12 electoral college afterwards, but I suppose if that's 13 what conservatives want, we can do that. So far, I have 14 not had to vote on a declaration of war, but this is 15 nearly as hard. It is not a game to be played lightly, 16 yet that's what modern communication has made it. 17 Politics has become an easy spectator sport for people 18 to tune in on their cable channel of choice, but it is 19 the new world we live and serve in." Do you see that? 20 A. Uh-huh. 21 Q. He says, "As for me, I will not be deterred 22 from seeking truth and voting my conscience and always 23 being willing to explain it even to ungrateful listeners 24 and constituents." Do you see that? 25 A. Uh-huh.</p>
<p style="text-align: right;">Page 374</p> <p>1 voters from other states unless I can see evidence it 2 has a chance of leading to proof. I may object to a 3 state or two, although I find it difficult to justify 4 voting to disenfranchise" -- "franchise voters from a state 5 with Republican senators who vouch for their states." 6 Do you see that, sir? 7 A. Uh-huh. 8 Q. He continues, "With regards to self-righteous 9 voters who think I'm their robot, you're welcome. 10 Probably not 1 percent of them supported Trump before I 11 did. None of them spent an ounce of political capital 12 on Trump's behalf. I spent it all. I'm certain none of 13 them have raised over 250,000 for the president's 14 defense team to piss down a rabbit -- a rat hole 15 pretending to be lawyers disguised as television 16 personalities. I am evidence no deed goes unpunished by 17 the mob, who believes they rule just because they live 18 in the freest place on earth." Do you see that? 19 A. Uh-huh. 20 Q. Mr. Cramer continues -- or Senator Cramer 21 continues. 22 A. Uh-huh. 23 Q. "As you can tell, I'm not just frustrated, I am 24 pissed off. Perhaps the most disappointing thing about 25 it is so many otherwise good people think America cannot</p>	<p style="text-align: right;">Page 376</p> <p>1 Q. And it -- he continues on to the next page. 2 A. Uh-huh. 3 Q. Do you see that? 4 A. Uh-huh. 5 Q. Now, were you aware of these sentiments by 6 Mr. Cramer on January 1st, 2021, sir? 7 A. When Scott -- I do remember this now, because 8 Scott made me aware of this. Now, did I read all this? 9 No. But I did read -- 10 MR. KACHOUROFF: Mike, let -- you've 11 answered the question, yes, I was aware of it. Now let 12 her ask you another one. 13 Q. (BY MS. WRIGLEY) And in the E-mail chain 14 before this one from Mr. Cramer, do you see that 15 Mr. Hennen on the second page -- are you -- are you with 16 me? 17 A. Yeah. 18 Q. He had written to Mr. Cramer on -- in a couple 19 of lines down, do you see that he said, "Can you just 20 proceed with your Cramer/Lindell/Johnson idea to do a 21 fair, expedited, lawyerlike review of 10 percent of the 22 best arguments"? 23 A. Where -- where are you looking here? What 24 page? 25 Q. Page 2, four paragraphs down in the Scott</p>

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<p style="text-align: right;">Page 377</p> <p>1 Hennen E-mail to Senator Cramer.</p> <p>2 A. "Can you proceed" --</p> <p>3 Q. Yes --</p> <p>4 A. -- "with your Cramer/Lindell/Johnson idea to do</p> <p>5 a fair, expedited, lawyerlike review of 10 percent of</p> <p>6 the best" --</p> <p>7 THE COURT REPORTER: I'm sorry.</p> <p>8 A. Is that the one?</p> <p>9 Q. (BY MS. WRIGLEY) Yes.</p> <p>10 A. Okay.</p> <p>11 Q. He says, "Can you proceed with your</p> <p>12 Cramer/Lindell/Johnson idea to do a fair, expedited,</p> <p>13 lawyerlike review" --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- "of 10 percent of the best arguments on the</p> <p>16 evidence."</p> <p>17 A. Uh-huh.</p> <p>18 Q. "Start with the Trump Hotel meeting and give</p> <p>19 Sidney Powell/General Flynn, et cetera, a fair hearing,</p> <p>20 see some actual proof, et cetera, and hold them</p> <p>21 accountable to any crackpot crack they have peddled."</p> <p>22 A. Uh-huh.</p> <p>23 Q. Do you see that?</p> <p>24 A. Yep.</p> <p>25 Q. And he sort of continues down, trying to</p>	<p style="text-align: right;">Page 379</p> <p>1 there.</p> <p>2 Q. And this was prior to January 1st, 2021?</p> <p>3 A. Prior to what?</p> <p>4 Q. January 1st, 2021?</p> <p>5 A. Oh, it was after January 1st.</p> <p>6 Q. Well, Mr. Hennen refers to that -- that Trump</p> <p>7 Hotel meeting in January --</p> <p>8 A. Oh, he does?</p> <p>9 Q. -- 2021.</p> <p>10 A. Where?</p> <p>11 Q. The fourth paragraph. "Start with the Trump</p> <p>12 Hotel meeting," indicating the meeting already took</p> <p>13 place?</p> <p>14 MR. KACHOUROFF: I don't read it -- I don't</p> <p>15 read it that way, but --</p> <p>16 A. Where do you see the Trump Hotel meeting?</p> <p>17 Q. (BY MS. WRIGLEY) Where it says, "Start with</p> <p>18 the Trump Hotel meeting and give Sidney Powell/General</p> <p>19 Flynn, et cetera, a fair hearing." Do you see that?</p> <p>20 MR. KACHOUROFF: That doesn't say that.</p> <p>21 A. Where do you -- where --</p> <p>22 Q. (BY MS. WRIGLEY) Are you in that paragraph?</p> <p>23 I'll just get us there, and then I'll ask the question.</p> <p>24 Are you with me, Mr. Lindell? It's the</p> <p>25 second page.</p>
<p style="text-align: right;">Page 378</p> <p>1 convince Senator Cramer to look into election fraud,</p> <p>2 correct?</p> <p>3 A. That's correct.</p> <p>4 Q. And Mr. Cramer, in response, basically sort of</p> <p>5 rejected Mr. --</p> <p>6 A. No, he looked into it. We had that meeting.</p> <p>7 Q. You did have the meeting?</p> <p>8 A. Uh-huh.</p> <p>9 Q. When was the meeting, sir?</p> <p>10 A. It was in Trump Hotel.</p> <p>11 Q. The meeting --</p> <p>12 A. The meeting --</p> <p>13 Q. Did it start with the Trump Hotel?</p> <p>14 A. -- they're talking about was in Trump Hotel,</p> <p>15 and we were -- I didn't have a lot to present,</p> <p>16 obviously, because I didn't have my evidence because it</p> <p>17 wasn't January 9th. Okay?</p> <p>18 But there was Ron Johnson from -- Ron</p> <p>19 Johnson was on by Skype. I remember Cramer was there.</p> <p>20 There was two other senators there. And all this stuff</p> <p>21 was presented, that I hadn't seen before, to them.</p> <p>22 Q. Was it presented by General Flynn and Sidney</p> <p>23 Powell?</p> <p>24 A. I don't know if Flynn was there. Sidney</p> <p>25 Powell's, her whole team, there was like a ton of them</p>	<p style="text-align: right;">Page 380</p> <p>1 A. I'm on the second page.</p> <p>2 Q. 1, 2, 3, 4, 5 --</p> <p>3 A. "Start with the Trump" --</p> <p>4 Q. Yes.</p> <p>5 A. -- "Hotel meeting." Because at the time, they</p> <p>6 had planned that meeting. Okay?</p> <p>7 Q. And it had not -- had it taken place yet?</p> <p>8 A. It had not happened yet. It happened on</p> <p>9 January 4th or 5th.</p> <p>10 Q. Okay. And that was before --</p> <p>11 A. I got my evidence on the 9th.</p> <p>12 Q. And the evidence was from Brannon Howse and</p> <p>13 Mary Fanning, correct?</p> <p>14 A. No. The evidence was from Dennis Montgomery,</p> <p>15 but she told me about Dennis Montgomery.</p> <p>16 Q. Okay.</p> <p>17 A. The evidence I seen at that meeting was all --</p> <p>18 this was even an add-on. This was like, wow. This was</p> <p>19 stuff that Sidney's group had.</p> <p>20 Q. And let me ask you about Sidney Powell. In --</p> <p>21 at the end of 2020, did you give any moneys to Sidney</p> <p>22 Powell to investigate election fraud claims?</p> <p>23 A. At the end of 2020?</p> <p>24 Q. Yes.</p> <p>25 A. No. I gave 50 -- I gave 50,000, and that money</p>

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<p style="text-align: right;">Page 381</p> <p>1 went to ASOF [sic] that -- whatever that guy's name 2 is -- Russell Ramsland in Texas. 3 Q. And then in 2021, did you give any money to 4 Sidney Powell to investigate election fraud? 5 A. No. 6 Q. How about General Flynn? Have you ever 7 paid General Flynn for any work on election fraud? 8 A. General Flynn, at the end of December of 2020, 9 I gave money to whatever he -- whatever they were doing. 10 Q. How much money did you give General Flynn? 11 A. I don't remember. 20 grand, 50 grand, whatever 12 it was. 13 Q. Okay. Now -- 14 A. I think it was early January. 15 Q. -- Senator Cramer did participate in this 16 meeting at the Trump Hotel? 17 A. Uh-huh. 18 Q. And was the purpose of that meeting to talk 19 about election fraud claims? 20 A. It was to show, yeah, election -- election 21 fraud, correct. 22 Q. And who was in charge of that meeting, sir? 23 A. I don't know. I -- I think -- I think Sidney, 24 I want to say, it could have been. You know, I might 25 have been -- I might have set it up. You know, I don't</p>	<p style="text-align: right;">Page 383</p> <p>1 his mind from what he expressed in Exhibit 631 after 2 this? 3 A. I have no idea. I have no idea. 4 Q. Has Senator Cramer ever publicly said that he 5 believed the election was rigged, the 2020 election? 6 A. I don't know. 7 Q. Has Senator Cramer ever told you that he 8 believes that voting machines had rigged the 2020 9 election? 10 A. I don't know. I can't remember back then. I 11 know he was very open to listening to -- he could not 12 explain when I put before him all these people that 13 voted. Oh, my god, tens of thousands. He couldn't 14 explain that. 15 And -- and when I said that it had to be 16 done with computers, he -- I think he agreed on that. 17 But you've got to -- he said, well, where's the 18 evidence? And then when I had it after January 9th, 19 viola, we've got the evidence. 20 Q. I'm going to hand to you Exhibit 632. 21 (Exhibit 632 marked.) 22 Q. (BY MS. WRIGLEY) It's marked as DEF 029858. 23 And look -- and it's two pages. 24 Looking at the top, do you see this is 25 another forwarded E-mail from Scott Hennen to yourself,</p>
<p style="text-align: right;">Page 382</p> <p>1 know. 2 Q. And, Mr. Lindell, why did you set it up? 3 A. Because I wanted to see more -- I wanted to 4 see -- I -- my evidence was this. What I kept telling 5 Kevin was, Kevin, you can't explain all these people 6 that voted. Because I had the voter rolls. I -- in 7 North Dakota, you had 4,000 people that voted that 8 didn't live in North Dakota, and nobody would give me 9 answers. 10 And it was like -- and by this time -- by 11 the time I got to this meeting, though, I will tell you 12 this, I had prayed that they would steal both those 13 senators, and they did. 14 And the reason I say that, if I look back 15 now, if Donald Trump would have been put in, we would 16 have lost our country forever. It's such a divine thing 17 that nothing happened back then, because now, three 18 years later, everything we had back then, it gets 19 validated why you have all these people that voted that 20 didn't live in these states. 21 Q. Now, if you look at the sentiment expressed by 22 Mr. Cramer in Exhibit 631, do you know if he changed his 23 mind after this? 24 A. What's that? 25 Q. Did -- do you know if Senator Cramer changed</p>	<p style="text-align: right;">Page 384</p> <p>1 and it's dated January 2nd, 2021? 2 A. Okay. 3 Q. And this was to your E-mail address, correct, 4 at MyPillow.com? 5 A. Yep. 6 Q. And Mr. Hennen wrote to you, "We need Sen Pat 7 Toomey at your Monday gathering of friends with Cramer. 8 See statement." Do you see that? 9 A. Yes. 10 Q. And is that -- the Monday gathering, is that 11 the Trump Hotel meeting? 12 A. Uh-huh. 13 Q. And he forwarded a message from Cramer that was 14 a forward from -- with a Toomey statement. Do you see 15 that? 16 A. (Witness peruses document.) 17 Yeah. 18 Q. And the E-mail below that forward from 19 Mr. Cramer to Scott Hennen was from a Robert -- 20 A. Uh-huh. 21 Q. -- Duncan to Rep Secretary Senators. It's a 22 list serve. Do you see that? 23 A. Uh-huh. 24 Q. And do you know who Robert Duncan is? 25 A. No.</p>

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<p style="text-align: right;">Page 385</p> <p>1 Q. Do you see it looks like it's a secretary of 2 senate gov list serve group E-mail address? 3 A. Senator of what -- I don't know what, a senator 4 of something. 5 Q. And it says in that E-mail from Robert Duncan, 6 "Senator Toomey asked that I forward you all his 7 statement below. Thanks." Do you see that? 8 A. Uh-huh. 9 Q. Do you know who Senator Toomey is? 10 A. No. 11 Q. Do you see it says, "Toomey statement"? Do you 12 see that, sir? 13 A. Yep. 14 Q. And it says, "A fundamental defining future of 15 a Democratic Republic is the right of the people to 16 elect their own leaders. The efforts by Senators 17 Hawley, Cruz and others to overturn the results of the 18 2020 presidential election in swing states like 19 Pennsylvania directly undermines those rights. The 20 senators justify their intent by asserting that there 21 have been many allegations of fraud. But allegations of 22 fraud by a losing campaign cannot justify overturning an 23 election. They failed to acknowledge that these 24 allegations have been adjudicated in courtrooms across 25 America and were found to be unsupported by the</p>	<p style="text-align: right;">Page 387</p> <p>1 MR. KACHOUROFF: She asked -- she asked you 2 if you're aware of it. 3 A. Am I aware of it? You just read it to me. I 4 am now. 5 Q. (BY MS. WRIGLEY) Do you recall receiving this 6 in an E-mail that -- 7 A. I -- I -- 8 Q. -- Mr. Hennen forwarded to you? 9 A. -- I guarantee I didn't read it. Probably 10 didn't read it. 11 Q. Are you aware of statements in January '21 by 12 senators that there was nothing -- no allegations of 13 fraud to justify -- 14 MR. KACHOUROFF: Same objection. 15 A. That's all subjective. 16 Q. (BY MS. WRIGLEY) -- overturning the election? 17 A. He didn't have what I had. 18 Q. During the Trump Hotel meeting in January 2020 19 [sic], was there discussion about senators not voting to 20 certify the election for Biden? 21 A. No. All it was -- the only thing I know I 22 brought up, I -- somebody explained to me how every 23 state -- I listed them off. Nevada, 6,000 people voted 24 that didn't live there. Wisconsin, 11,000 people voted 25 that didn't live there. You pick any state, I had them</p>
<p style="text-align: right;">Page 386</p> <p>1 evidence. President Trump's own Attorney General, Bill 2 Barr, stated 'We have not seen fraud on a scale that 3 could have effected a different outcome in the 4 election.' I acknowledge that this past election, like 5 all elections, had irregularities, but the evidence is 6 overwhelming that Joe Biden won this election. His 7 narrow victory in Pennsylvania is easily explained by 8 the decline in suburban support for President Trump and 9 the President's slightly smaller victory margins in most 10 rural counties." 11 A. Uh-huh. 12 Q. "I voted for President Trump and endorsed him 13 for reelection, but on Wednesday, I intend to vigorously 14 defend our form of government by opposing this effort to 15 disenfranchise millions of voters in my state and 16 others." 17 A. Uh-huh. 18 Q. Do you see that? 19 Were you aware of this statement from 20 Senator Toomey? 21 MR. KACHOUROFF: I'm going to object on the 22 grounds that this statement is hearsay and completely 23 irrelevant. 24 A. Yeah. If you want me to comment on it, there's 25 been nothing we can do --</p>	<p style="text-align: right;">Page 388</p> <p>1 laid out. It was unbelievable. 2 Nobody could -- everyone stood back and 3 went, what? And then Powell and them did their thing 4 saying it was done with computers. 5 Q. I'm going to hand you another document, sir. 6 Before I do that, let me ask you this: 7 Prior to February 5th, 2020 and the release of "Absolute 8 Proof," did you ever go to the website of CISA, the 9 Cybersecurity & Infrastructure Security Agency? 10 A. Actually, I think we did, but I don't know 11 which -- what -- if it was before or after. 12 Q. I'm going to hand you Exhibit 633, sir. 13 (Exhibit 633 marked.) 14 Q. (BY MS. WRIGLEY) I'll represent this was 15 marked as Exhibit 115 to the complaint, and it's a 16 printout from the CISA.gov website, the rumor control 17 section. 18 Take a look at this document and tell me if 19 you've ever seen this Rumor Vs. Reality section of 20 CISA's website? 21 A. Uh-huh. This is pretty funny, this part. 22 THE COURT REPORTER: I'm sorry. 23 A. Yeah. I said, that's pretty funny, here on 24 CISA's own site, "Robust safeguards, including 25 canvassing procedures to help ensure the accuracy of</p>

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<p style="text-align: right;">Page 389</p> <p>1 election" -- "official election results. We have 2 canvassed over 50 states and over a million voters 3 and" -- 4 MR. KACHOUROFF: Mike, let her ask a 5 question. 6 THE WITNESS: No. I'm -- 7 (Crosstalk.) 8 MR. KACHOUROFF: There's no question 9 pending. 10 MS. WRIGLEY: I'm going to move to strike 11 as nonresponsive. 12 Q. (BY MS. WRIGLEY) Have -- are you aware that 13 CISA published research on its website to address rumors 14 versus reality in connection with the 2020 election? 15 A. No. 16 MR. KACHOUROFF: Objection, again, hearsay. 17 This is not -- this is completely irrelevant to the 18 entire case. 19 Q. (BY MS. WRIGLEY) Did you check information on 20 CISA's website prior to -- 21 A. No. 22 Q. -- releasing -- 23 A. No. 24 Q. -- "Absolute Proof" on February 5th, 2021? 25 A. I don't know, but I was -- what I looking</p>	<p style="text-align: right;">Page 391</p> <p>1 Q. Do you remember what website Dennis Montgomery 2 guided you to prior to February 5th, 2021, sir? 3 A. No. 4 Q. Not a single one, as you sit here? 5 A. No. They were all government websites to prove 6 he -- that he was real, to prove that he was -- that he 7 had a job there. I was buying into his company, too. I 8 bought into his company. 9 Q. And what information did he show you with 10 respect to the 2020 election when he sent you to these 11 websites, sir? 12 A. All of the massive data, which I had a guy 13 verify, and flips of the election. You've just seen a 14 smidgen of it in that movie. You guys have a copy of 32 15 terabytes of data. 16 Q. And he -- he showed you that information by 17 going to a publicly available website? 18 A. No. By his website. 19 Q. Whose own website? 20 A. It was his -- his Hammer, his -- his computer. 21 Q. His computer, Hammer -- the Hammer and 22 Scorecard? 23 A. No. That's -- the Hammer and Scorecard is 24 owned by the government. Yeah, the government has that. 25 Q. Did he hack into a government system and then</p>
<p style="text-align: right;">Page 390</p> <p>1 for was -- I think the Raffensperger case, that Curling 2 case after that. I know Antrim County, Michigan got 3 brought up, and I might have looked at that because I 4 think they -- but I don't know. 5 Q. In connection with validating information that 6 you were given on January 9th from Mary Fanning and 7 Brannon Howse, did you think you should look up 8 information on CISA's website? 9 A. No. I thought I should go right to the 10 government and to the CIA and people that were there. 11 Q. All right. And so you didn't consider 12 information -- 13 A. I didn't even know what CISA was, to be honest 14 with you. 15 Q. Did you go to any federal government agency's 16 website to get information about the 2020 election -- 17 A. Hundred percent. Dennis Montgomery sent me -- 18 THE COURT REPORTER: I can only take one at 19 a time. 20 A. A hundred percent. Dennis Montgomery guided me 21 through all that. 22 Q. (BY MS. WRIGLEY) What websites did you go to, 23 sir? 24 A. I don't know. He brought me to all of the 25 websites, CIA, all the stuff back then.</p>	<p style="text-align: right;">Page 392</p> <p>1 let you have access to that? 2 A. No. He's got -- he's got the technology. He 3 owns the technology. The government paid him for his 4 technology. 5 Q. Did you pay Dennis Montgomery for any work that 6 he did in connection with your "Absolute Proof," 7 "Absolute Interference" and "Scientific Proof" series? 8 A. No. 9 Q. Have you ever paid Dennis Montgomery any money? 10 A. Absolutely. 11 Q. What? How much? 12 A. A lot. 13 Q. How much? 14 A. Couple million. 15 Q. And what did you pay him a couple million 16 dollars for, sir? 17 A. For part of his company, Bixware. I think the 18 other one's called eTreppid. It's a compression 19 technology. And then also to -- to keep going to -- 20 further to keep -- to keep going to -- he has to 21 extrapolate all of the states, all of the cities and 22 all the -- all the counties out individually, one at a 23 time. It takes time, the computers roll, and that's all 24 the data. 25 Q. Okay. Just so the record's clear, Mr. Lindell,</p>

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<p style="text-align: right;">Page 393</p> <p>1 you don't consider Dennis Montgomery to be a con artist; 2 is that right? 3 A. What's that? No. He's one of the most 4 brilliant men I've ever met in my life. Probably the 5 smart -- probably one of the top five smartest men in 6 history. 7 Q. Do you consider Dennis Montgomery to be a scam 8 artist, sir? 9 A. Huh-uh. Absolutely not. 10 Q. Do you consider him to be a liar? 11 A. No. 12 Q. Do you consider him to be a criminal? 13 A. No. 14 Q. Are you aware of any illegal activities that 15 Dennis Montgomery has engaged in? 16 A. He -- it shows -- you guys -- everybody showed 17 me here today that he had something with Caesars Palace 18 with some marker, and that's the only thing I've ever 19 heard about him. He owed Caesars Palace -- I've been in 20 that world. 21 Q. And the information from Dennis Montgomery is 22 based on Hammer and Scorecard, correct? 23 A. The what? 24 Q. Is based on Hammer and Scorecard, correct? 25 A. The data?</p>	<p style="text-align: right;">Page 395</p> <p>1 mentioned? 2 A. Before the 5th? 3 Q. Yes. 4 A. I hired guys to dive into it, Dennis 5 Montgomery. I wanted to find out why all these people 6 voted in these states. His evidence validated exactly 7 what I already had, but nobody could explain it. You 8 can't explain it to this day if I had it here. 9 Just like John Merrill couldn't explain in 10 Alabama how you have 4,660 people voted over 110 years 11 old. They didn't vote. Their names were used. 12 That's -- I don't know why anybody doesn't say, hey, 13 let's look into this, you know. 14 That's all I did. I did my due diligence, 15 and I did it for three years. Then cast vote records 16 came out. They didn't even -- validation after 17 validation after validation. 18 MR. KACHOUROFF: What number was the last 19 one? I'm sorry. 20 MS. WRIGLEY: 633. 21 MR. KACHOUROFF: I'm fading. Good for you. 22 A. It kind of gets tiring when you say -- you 23 bring up stuff like this about people saying there's -- 24 Mike, there's no evidence -- 25 MR. KACHOUROFF: Mike. Mike.</p>
<p style="text-align: right;">Page 394</p> <p>1 Q. Yes. 2 A. He pulled -- he pulled all the data from the 3 2020 election from -- he pulled the data. So he -- he 4 basically made a copy of it, which our government should 5 have been doing, I guess. 6 Q. Now, back to CISA's website -- or let me just 7 ask you this: Prior to February 5th, 2021, did you do 8 anything to educate yourself on information that CISA 9 made publically available about the security of the 2020 10 election? 11 A. Now, I did go to John Ratcliffe. I believe 12 that was the DNI, though. I did investigate that 13 because John was the -- I think he was head of the 14 Department of National Intelligence, whatever it was -- 15 I think it's called DNI. 16 And he came out with a statement on 17 January 7th that China hacked into -- that they had 18 been -- intruded in our election or something like that 19 and it validated -- that was on January 7th, but it kind 20 of got lost in all the January 6th stuff. 21 And John Ratcliffe made that statement, and 22 I'm going, wow, there's more evidence that China was 23 involved in -- with these computers. But I don't think 24 he works for CISA. He worked for the DNI. 25 Q. Okay. Anything else besides what you just</p>	<p style="text-align: right;">Page 396</p> <p>1 THE WITNESS: I'm going to state this for 2 the record. 3 A. There are people who have been constantly 4 saying to me, there's no evidence, in court, there's no 5 evidence, there's no evidence. Mike, did you see this 6 guy said there's no evidence? 7 Nobody looked at my evidence. Let's look 8 at these people voted that didn't live in the states. 9 That's - nobody has looked at that and gave me an 10 explanation. Nobody. I said it. 11 MS. WRIGLEY: Move to strike as 12 nonresponsive. 13 THE WITNESS: They're looking for papers. 14 (Exhibit 634 marked.) 15 Q. (BY MS. WRIGLEY) Let me hand to you 16 Exhibit 634, sir. 17 MR. KACHOUROFF: 634? 18 MS. WRIGLEY: 634. 19 Q. (BY MS. WRIGLEY) This was also marked as an 20 exhibit to the complaint. It's a press release that was 21 put out on -- 22 MR. KACHOUROFF: Same objections as my 23 previous ones. 24 Q. (BY MS. WRIGLEY) -- November 12th, 2020 -- 25 A. Uh-huh.</p>

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<p style="text-align: right;">Page 397</p> <p>1 Q. -- on the Security & Infrastructure -- Security</p> <p>2 Agency's website, CISA's website.</p> <p>3 A. Uh-huh.</p> <p>4 Q. Bottom left-hand corner indicates the place on</p> <p>5 the web that it was printed from and the date of the</p> <p>6 capture.</p> <p>7 Sir, have you ever seen this joint</p> <p>8 statement --</p> <p>9 A. No.</p> <p>10 Q. -- that was put out?</p> <p>11 A. No.</p> <p>12 Q. Did you ever bother to look at any public</p> <p>13 statements?</p> <p>14 A. No. I was just looking at states that said</p> <p>15 they had people that voted that didn't live there.</p> <p>16 That's what I was looking at. And nobody can ever</p> <p>17 explain that to me.</p> <p>18 Q. Okay.</p> <p>19 A. And CISA wouldn't explain it to me either.</p> <p>20 They just said everything -- all is well.</p> <p>21 Q. Let me go through this --</p> <p>22 A. What's that?</p> <p>23 Q. -- and see if it refreshes your recollection.</p> <p>24 The title of this, you see at the top, is</p> <p>25 "Joint Statement from Elections Infrastructure</p>	<p style="text-align: right;">Page 399</p> <p>1 explain all these people that voted that didn't live in</p> <p>2 these states. Hundreds, if not millions, of people.</p> <p>3 That's what I would have said.</p> <p>4 Nothing they could have said would have</p> <p>5 changed my mind because I have my own evidence, and</p> <p>6 nobody would -- and I'm not going to change anything on</p> <p>7 that just because they say that. They didn't see what</p> <p>8 I -- they didn't look at what I see -- what I had. They</p> <p>9 couldn't explain it.</p> <p>10 Q. Did you --</p> <p>11 A. They can sit there and tell me it was a safe</p> <p>12 election all they want, but they're not going to change</p> <p>13 my mind. Then explain these people that voted -- it</p> <p>14 hadn't happened in other elections to that magnitude.</p> <p>15 It was crazy.</p> <p>16 Q. Mr. Lindell, do you see where the statement</p> <p>17 indicates, "The November 3rd election was the most</p> <p>18 secure in American history. Right now across the</p> <p>19 country election officials are reviewing and</p> <p>20 double-checking the entire election process prior to</p> <p>21 finalizing the result. When states have close</p> <p>22 elections, many will recount ballots. All the states</p> <p>23 with close results in the 2020 presidential race have</p> <p>24 paper records of each vote, allowing the ability to go</p> <p>25 back and count each ballot, if necessary. There is an</p>
<p style="text-align: right;">Page 398</p> <p>1 Government Coordinating Council & the Election</p> <p>2 Infrastructure Sector Coordinating Executive</p> <p>3 Committees."</p> <p>4 Do you see that?</p> <p>5 A. Uh-huh.</p> <p>6 Q. And then the first paragraph reads, "The</p> <p>7 members of the Election Infrastructure Government</p> <p>8 Coordinating Council Executive Committee, Cybersecurity</p> <p>9 and Infrastructure Security Agency, CISA, Assistant</p> <p>10 Director Bob Kolasky, U.S. Election Assistance</p> <p>11 Commission Chair Benjamin Hovland, National Association</p> <p>12 of Secretaries of State President Maggie Toulouse</p> <p>13 Oliver, National Association of State Election Directors</p> <p>14 President Lori Augino, and Escambia County, Florida,</p> <p>15 Supervisor of Elections David Stafford, and the members</p> <p>16 of the Election Infrastructure Sector Coordinating</p> <p>17 Council Chair Brian Hancock, Vice-Chair Sam Derheimer,</p> <p>18 Chris Wlaschin, Ericka Hass, and Maria Bianchi released</p> <p>19 the following statement."</p> <p>20 Do you see that, sir?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Were you aware that there were a number of</p> <p>23 federal agencies or officials that had reached a joint</p> <p>24 statement in November of 2020?</p> <p>25 A. No, I wasn't, but if I was, I would have said</p>	<p style="text-align: right;">Page 400</p> <p>1 added benefit for security and resilience. This process</p> <p>2 allows for the identification and correction of any</p> <p>3 mistakes or errors. There is no evidence that any</p> <p>4 voting system deleted or lost votes, changed votes, or</p> <p>5 was in any way compromised."</p> <p>6 Do you see that?</p> <p>7 A. Now, are you aware Arizona hadn't even finished</p> <p>8 counting their votes when they were putting this out?</p> <p>9 Q. Sir, are -- were you aware that there was a</p> <p>10 joint statement issued --</p> <p>11 A. No, absolutely not. I told you what I was</p> <p>12 doing. Absolutely not.</p> <p>13 Q. Sir, let's -- this was 634.</p> <p>14 A. I made everything I did on my own due</p> <p>15 diligence, my own evidence. I can't believe they put</p> <p>16 out a statement before the election is done. That's</p> <p>17 weird. I didn't know about that. I would have</p> <p>18 questioned that back then for sure. How can you say</p> <p>19 it's a fair election when it wasn't even over? They</p> <p>20 were still counting votes until November 14th.</p> <p>21 Q. I'm going to show you another document, sir.</p> <p>22 (Exhibit 635 marked.)</p> <p>23 Q. (BY MS. WRIGLEY) This is 635, sir, previously</p> <p>24 attached to the complaint as Exhibit 51.</p> <p>25 A. Okay.</p>

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<p style="text-align: right;">Page 401</p> <p>1 Q. I'll represent that it's a press release issued</p> <p>2 from the Secretary of State of Michigan on January 5th,</p> <p>3 2021.</p> <p>4 Before I ask you about this exhibit, let me</p> <p>5 ask you prior to --</p> <p>6 MR. KACHOUROFF: Same objections as the</p> <p>7 previous.</p> <p>8 Q. (BY MS. WRIGLEY) Prior to January 5th, 2021,</p> <p>9 did you ever go to the website of the Secretary of State</p> <p>10 of Michigan to see what information it released publicly</p> <p>11 about the 2020 election?</p> <p>12 A. No, but I did search Michigan's websites, their</p> <p>13 election websites, because that's when I found out they</p> <p>14 counted the votes in Michigan the morning of the 3rd,</p> <p>15 not the lie they told us in the middle of the night on</p> <p>16 the 4th when 106,000 came out for Biden and Jocelyn</p> <p>17 Benson could not explain that. Her office could not</p> <p>18 explain that.</p> <p>19 Q. So let me ask you the same question. Prior to</p> <p>20 February 5th, 2021, did you ever go to the website of</p> <p>21 Secretary of State of Wisconsin to see the</p> <p>22 information --</p> <p>23 A. I went to their election site, Wisconsin</p> <p>24 election site. You have to go there to get results and</p> <p>25 stuff.</p>	<p style="text-align: right;">Page 403</p> <p>1 where all the people voted that don't live there. That</p> <p>2 was the first state I found, 12,000 people who --</p> <p>3 Q. Arizona?</p> <p>4 A. Absolutely. I went to almost every state's</p> <p>5 website.</p> <p>6 Q. Georgia?</p> <p>7 A. Yep.</p> <p>8 Q. Okay. And so for each of those states --</p> <p>9 A. Alabama, Missouri, Indiana, Illinois.</p> <p>10 Q. For any of the states' websites you visited to</p> <p>11 get information about the 2020 election prior to</p> <p>12 January 5th, 2021, would you have reviewed public</p> <p>13 releases by the secretaries of state from those</p> <p>14 individual states?</p> <p>15 A. No. I didn't care about their little</p> <p>16 statements. I cared about the corruption. I cared</p> <p>17 about what the facts were. Like in Michigan, a hundred</p> <p>18 and six votes came down, and they said they were mail-in</p> <p>19 votes. I wanted to see what they had to say about that.</p> <p>20 Turns out it was the morning of the 3rd.</p> <p>21 I went to Pennsylvania's website. I didn't</p> <p>22 listen to their statements. They didn't have a</p> <p>23 statement. They couldn't explain more votes than</p> <p>24 voters.</p> <p>25 I went to Georgia, and Georgia was so</p>
<p style="text-align: right;">Page 402</p> <p>1 Q. The Wisconsin website?</p> <p>2 A. Yes.</p> <p>3 Q. And the --</p> <p>4 A. No. No. No. This is the Michigan. Michigan.</p> <p>5 Q. Okay. I -- so let me just make sure my --</p> <p>6 A. This is Michigan. I'm sorry.</p> <p>7 Q. Prior to February 5th --</p> <p>8 A. Right.</p> <p>9 Q. -- 2021, did you go to the website of the</p> <p>10 Secretary of State of Michigan to get information about</p> <p>11 the 2020 presidential election?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And --</p> <p>14 A. And I found what I needed.</p> <p>15 Q. Same question for Wisconsin. Did you go to the</p> <p>16 Wisconsin website?</p> <p>17 A. Uh-huh.</p> <p>18 Q. How about Pennsylvania?</p> <p>19 A. I don't -- yes, I did Pennsylvania, too,</p> <p>20 because Pennsylvania had more votes than voters, and no</p> <p>21 one has ever been able to explain that. 80,000 more</p> <p>22 votes than voters, and nobody can explain that. And</p> <p>23 they turned in their electors. It's against the law.</p> <p>24 Q. What about Nevada, sir?</p> <p>25 A. Yes, definitely Nevada, because that -- that's</p>	<p style="text-align: right;">Page 404</p> <p>1 bad -- it was like crazy. I mean, they had all -- even</p> <p>2 that phone call, all the stuff. Everything I looked for</p> <p>3 was to explain how you had more -- people voted there</p> <p>4 that didn't live there.</p> <p>5 Wisconsin was a mess.</p> <p>6 Nevada was the first state, by the way,</p> <p>7 when I went to their website, where there was -- I think</p> <p>8 it's -- it was over 10,000 people that voted that didn't</p> <p>9 live in Nevada.</p> <p>10 Now, Nevada has a law you have to be a</p> <p>11 resident for 30 days, and I thought are people that --</p> <p>12 you know, at first I thought, wow, are there that many</p> <p>13 people cheating? And then I found out -- then I started</p> <p>14 checking other states.</p> <p>15 MR. KACHOUROFF: Mike, let her finish.</p> <p>16 She's going to ask another question.</p> <p>17 THE WITNESS: She asked me. I did go to</p> <p>18 all these sites.</p> <p>19 MR. KACHOUROFF: Yeah, then tell her that.</p> <p>20 So the answer is yes.</p> <p>21 Q. (BY MS. WRIGLEY) Now, if you look at Exhibit</p> <p>22 635, sir, this is a press release from January 5th, 2021</p> <p>23 by Secretary of State Jocelyn Benson.</p> <p>24 Do you see that?</p> <p>25 A. Uh-huh.</p>

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<p style="text-align: right;">Page 405</p> <p>1 Q. Do you see the title of this is "Michigan's 2 election was secure and fair and the results are 3 accurate," right? 4 A. Uh-huh. 5 Q. Now, did Secretary of State Jocelyn Benson lie 6 in putting out this press release? 7 A. A hundred percent in my mind because I already 8 knew on their own website that those votes were not 9 counted in the middle the night like she said they were. 10 She said those were the mail-in votes, and she lied. 11 They were counted on the morning of the 3rd. So she 12 lost all credibility with me. All credibility. Her 13 statement -- what a liar. How can you have a secure 14 election -- 15 And by the way, Michigan broke the law. 16 She did. She sent out 6 million ballot registrations 17 illegally that -- the legislatures make those laws, not 18 the Secretary of State. She did it and said, well, it's 19 the China virus. So we're going to stick out all these 20 ballots. They dumped 6 million of them all over 21 Michigan, and that was illegal. Her Attorney General 22 did not go after her. We went after her so much, many 23 people did, and won so many cases against her. 24 But I knew this -- on this day when this 25 came out, which was January 5th, she had already broke</p>	<p style="text-align: right;">Page 407</p> <p>1 election, you weren't following those lawsuits or the 2 results of the lawsuits -- 3 A. I never watched any of them. I was doing my 4 own thing because I was going into the heart of the 5 thing, the anomalies, the things that couldn't make 6 sense. How did Pennsylvania turn in votes and have more 7 votes than voters? It didn't -- 8 MR. KACHOUROFF: Again, hold on. Stop. 9 THE WITNESS: I -- 10 MR. KACHOUROFF: Mike. Mike, wait. 11 Objection, relevance. You're calling on 12 him to -- what -- argue about what the standing is in a 13 particular election case? Not the merits? You want him 14 to go over the merits of cases? Because there are none 15 of those cases. They're all -- 16 A. Yeah, I really didn't follow -- 17 MR. KACHOUROFF: Stop, Mike. We'll be here 18 all day if we keep doing this type of questioning. 19 Q. (BY MS. WRIGLEY) Were you following the 20 lawsuits challenging the results of the election? 21 MR. KACHOUROFF: Objection. 22 A. No, I -- 23 MR. KACHOUROFF: Stop. 24 Same objection. 25 A. No, I wasn't. I wasn't. I'm telling you I</p>
<p style="text-align: right;">Page 406</p> <p>1 the public's trust by lying and saying those were 2 mail-in votes on the morning of the -- 3 Q. Excuse me, Mr. Lindell. 4 Mr. Lindell, let me ask you: You're aware 5 that the Trump campaign filed a number of lawsuits 6 challenging the results of the 2020 election at the end 7 of 2020, correct? 8 A. I have no idea what all they did. I just know 9 what I did. 10 Q. Okay. Were you following the lawsuits that 11 were being filed at all? 12 A. Huh-uh. Nope. I was following my -- Rudy 13 Giuliani had a couple of things, but the media wasn't 14 there. So you never got to find out. There was only 15 one outlet there, RSBI. Any other time in history, 16 every outlet would be there. I thought that was weird. 17 I was doing my own thing. I was watching 18 Arizona so close. Arizona didn't make sense to me. I 19 was doing my own stuff with anomalies. I was getting my 20 own voter rolls, doing my own thing. 21 What they were doing out there -- they 22 didn't have what I had. I had something you can't 23 explain. That was the big thing. 24 Q. Mr. Lindell, in terms of any lawsuits that were 25 filed to challenge the results of the presidential</p>	<p style="text-align: right;">Page 408</p> <p>1 wasn't. The election was still going on. It didn't get 2 counted until here. I was doing my own thing. I didn't 3 know -- I heard there was -- none of them were ever 4 based on the merit. None of them had -- none of them 5 were based on merit. They were shoved out on standing 6 and all kinds of stuff. 7 (Exhibit 636 marked.) 8 Q. (BY MS. WRIGLEY) I'm going to show you another 9 document, sir. This is going to be 636. It's an 10 excerpt from a text exchange. 11 For the record, this is DEF 034862. It's a 12 text chain, which is long. It's over a hundred pages. 13 So we only have an excerpt here. The excerpt is Page 1, 14 128 through 133. 15 Looking at this exhibit, sir, do you see at 16 the top this is a text chain -- 17 A. Uh-huh. 18 Q. -- between yourself and Kim Rasmussen? 19 A. Uh-huh. 20 Q. And I think you identified Ms. Rasmussen 21 earlier for the record. 22 A. Uh-huh. 23 Q. Do you remember that? 24 Can you just remind me who is Ms. -- 25 A. What's that?</p>

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1 Q. Can you remind me who is Kim Rasmussen?

2 A. She worked for me. She was -- worked for

3 MyPillow. She quit like three years ago, four years

4 ago.

5 Q. Now, this text message, if you look on Page 1,

6 starts on March 30th, 2020. Do you see that?

7 A. That's right.

8 Q. I'm going to jump to the second page, which is

9 Page 128 of this document produced.

10 A. Uh-huh.

11 Q. Do you see at the top there's a date

12 February 5th, 2021? It's on the top of the second page,

13 which is 128 of this.

14 A. Yes.

15 Q. And Ms. Rasmussen sent you a text, "When and

16 where can I see the documentary?"

17 Do you see that?

18 A. Uh-huh.

19 Q. And this is the date you did "Absolute Proof,"

20 correct?

21 A. That's correct.

22 Q. You responded, "Tomorrow. Go to my website or

23 watch on OAN."

24 Do you see that?

25 A. That's right. Yep.

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1 Q. And she responds, "Thumbs up. I have chills.

2 I am watching it."

3 Do you see that?

4 A. Uh-huh.

5 Q. And you indicate, "I worked until 5:00 a.m."

6 Correct?

7 A. Right.

8 Q. And she responds, "Wow. Get some sleep. I

9 really like the set you're on."

10 Do you see that?

11 A. Uh-huh.

12 Q. You say, "I go on TV in 45 minutes and meet the

13 president in 2 hours."

14 Do you see that?

15 A. Uh-huh.

16 Q. And did you meet with President Trump on

17 February 5th, 2020?

18 A. No.

19 Q. No. Okay.

20 I'm going to have you jump to the next

21 page.

22 Do you see on the next page you and

23 Ms. Rasmussen continue to text back and forth?

24 A. "How much have you read?"

25 Q. Do you see that, sir?

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1 A. What am I looking at here?

2 Q. You say, "How much have you read? Watched, I

3 mean."

4 At the top.

5 A. I don't know how much she read. I don't know

6 what she's talking about.

7 Q. If you go back to the prior page, I'm assuming

8 it's the documentary. It's still --

9 A. Well, you don't read a documentary.

10 Q. No, that's why you say, "How much have you

11 read? Watched, I mean."

12 A. Oh, watched. Okay. Got it.

13 Q. She says, "About 35 minutes. Your video is

14 down. Matt has a server you can put it on. The server

15 is with American Eagle who does the Super Bowl. Do you

16 think it crashed?"

17 Do you see that?

18 A. Yep.

19 Q. You respond, "The Eagle took it down. Go back

20 to the" --

21 A. "Website and start over."

22 Q. -- "website and start over."

23 Do you see that?

24 A. Yeah.

25 Q. And she says, "It's up."

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1 Do you see that?

2 A. Uh-huh.

3 Q. She also includes a link to a Business Insider

4 article at the bottom here.

5 Do you see that?

6 A. Uh-huh.

7 Q. It says, "Businessinsider.com," and then the

8 title is "MyPillow made three-hour film about election

9 fraud. Trump 2021."

10 A. Okay.

11 Q. Do you see that?

12 A. Yeah.

13 Q. And on the next page, do you see there's a

14 couple of images from the Insider with you on the phone,

15 sir?

16 A. Uh-huh.

17 Q. I want to mark that Business Insider article

18 for you that Ms. Rasmussen sent you in a text.

19 (Exhibit 637 marked.)

20 Q. (BY MS. WRIGLEY) This is going to be

21 Exhibit 637, sir.

22 A. This one is probably going to take longer than

23 five minutes, right?

24 Q. You have your call, right?

25 A. In about four minutes.

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1 Q. Okay. Yeah. Why don't we go off the record.
2 MR. KACHOUROFF: Okay.
3 A. I mean, I'll go a little extra, but I've got to
4 make this call.
5 THE VIDEOGRAPHER: Going off the record at
6 4:46.
7 (Short recess.)
8 THE VIDEOGRAPHER: And we're back on record
9 at 4:59.
10 Q. (BY MS. WRIGLEY) Mr. Lindell, I think you have
11 in front of you Exhibit 637, which is the Business
12 Insider article that was sent in the text from Kim
13 Rasmussen to yourself, and that was in Exhibit 636.
14 Have you reviewed this -- or have you read
15 this Business Insider article before?
16 A. I -- they write articles on me, about probably
17 a thousand of them in the last three years. I have no
18 idea.
19 Q. When Ms. Rasmussen texted it to you, would
20 you --
21 A. Oh, she text -- this is the one she text me?
22 Q. Yes, it is, sir. When she texted that to you,
23 did you --
24 A. Yeah, I'm sure I read it then.
25 Q. Okay. And do you see that the title of this

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1 article from the Business Insider is "MyPillow CEO Mike
2 Lindell is releasing a three-hour movie he made over the
3 past five days pushing a baseless election fraud claim
4 involving China"?
5 Do you see that?
6 A. Yeah. I'm not sure I said a baseless claim of
7 issues on election day.
8 Q. It's the title, whether you agree with it or
9 not.
10 Do you see that?
11 And the date from the article from this
12 Business Insider is February 5th, 2021.
13 Do you see that, sir?
14 A. Yeah.
15 Q. And it's got a picture of you in the front.
16 Do you see that?
17 A. Uh-huh.
18 Q. And the caption below the picture says,
19 "MyPillow CEO Mike Lindell outside the White House on
20 January 15th."
21 Do you see that?
22 A. Correct. Yes.
23 Q. And did you make a visit to the White House on
24 January 15th?
25 A. Yes, I did.

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1 Q. And did you talk with President Trump about
2 election fraud?
3 A. I brought him, I think to be signed, the gag
4 order that Dennis Montgomery was under so he could sign
5 that so that his evidence could be released to the
6 country.
7 Q. Was that gag order -- order signed by President
8 Trump?
9 A. No. He -- when I met with the president, he
10 said -- I talked to him about it and -- and then I had
11 an envelope that was a sealed envelope.
12 And I said, here, this also come from some
13 attorneys. And there was a guy named Robert -- Robert
14 O'Brien. He was sitting there, and the president
15 handed -- he opened up the envelope. He said take both
16 of these upstairs to the lawyers and see if there's
17 something to this, to Robert O'Brien. Robert O'Brien
18 brought me upstairs to the lawyers.
19 Q. And were you then allowed to go back and speak
20 with President Trump after talking with the lawyers?
21 A. No. I went up to the lawyers, and I showed
22 them -- I gave them the papers that the president had
23 opened up. It was recommendations from some lawyers.
24 The first one said fire Robert O'Brien,
25 which was the guy sitting right there that was going to

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1 be first.. But they bring him upstairs and -- they bring
2 him upstairs. He gave the lawyer up there -- I forget
3 what his name was -- gave him them papers. And I still
4 had the one that he had to sign for Dennis Montgomery.
5 And I had four pieces of evidence I showed
6 the president. I said it was all done with computers.
7 I said John Ratcliffe explained what he had said on the
8 7th.
9 And at that time, the lawyer came out,
10 grabbed the papers, then he came out, gave them back to
11 me, and a gal brought me back downstairs in the west
12 wing there in the lobby and said, well, we'll call you
13 back up.
14 Then she came back down I'll say two
15 minutes later and said it's going to be at least two
16 hours. We're not going to have time to see you.
17 And I said no. I said this is a matter of
18 national security. I said I'm not leaving until he
19 tells me I can leave and I said I'll wait the two hours.
20 So at that time I asked to use my phone
21 outside the White House west wing.
22 And by the way, she had handed the papers
23 back. Never read those papers.
24 And she said, yeah, you go ahead and use
25 your phone.

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<p style="text-align: right;">Page 417</p> <p>1 I went outside. There was just me and the</p> <p>2 guard standing out there. I was on the phone with my</p> <p>3 son when that picture was taken, and I watched media</p> <p>4 come flying over the hill like a bunch of -- a herd of</p> <p>5 buffalo, and that picture was taken by a guy from the</p> <p>6 Washington Post about a quarter mile away, and he beamed</p> <p>7 in on those papers from the -- from the lawyers and it</p> <p>8 said martial law. So that was the thing that went</p> <p>9 viral.</p> <p>10 Q. Now, the papers that you were given by the</p> <p>11 lawyers, was one of those lawyers Sidney Powell?</p> <p>12 A. I have no idea.</p> <p>13 Q. Who were the lawyers that gave you those</p> <p>14 papers?</p> <p>15 A. I have no idea who the lawyers were at that</p> <p>16 time. It was an envelope. It might have been Sidney</p> <p>17 Powell. I don't remember who actually gave me that</p> <p>18 sealed envelope.</p> <p>19 Q. Somebody gave you --</p> <p>20 A. It wasn't Sidney Powell.</p> <p>21 Q. Somebody gave you an envelope with some papers,</p> <p>22 but you don't --</p> <p>23 A. Recommendations to the President, and the guy</p> <p>24 gave them to me. I don't know all the lawyers that were</p> <p>25 behind it. I've never read those papers to this day</p>	<p style="text-align: right;">Page 419</p> <p>1 THE WITNESS: The papers that were handed</p> <p>2 to me for the White House.</p> <p>3 MR. KACHOUROFF: I don't even know who --</p> <p>4 where that came from, Mike. You can tell her if you</p> <p>5 know.</p> <p>6 Q. (BY MS. WRIGLEY) Who are the lawyers, sir?</p> <p>7 A. Huh?</p> <p>8 Q. Who are the lawyers that you know handed you</p> <p>9 these papers to give to the President?</p> <p>10 A. I don't know who the team of lawyers were. I</p> <p>11 have no -- I didn't -- Sidney Powell was not one of my</p> <p>12 lawyers.</p> <p>13 Q. Okay. So --</p> <p>14 A. I didn't have any lawyers. I didn't hire</p> <p>15 lawyers.</p> <p>16 Q. So somebody gave you some papers to give to the</p> <p>17 President?</p> <p>18 A. It was a team, though. It had to be a trusted</p> <p>19 person, like a cyber guy, maybe one of Patrick Byrne's</p> <p>20 people. I don't know.</p> <p>21 Q. Okay. Let me just make sure I --</p> <p>22 A. It was a guy I met before I -- actually, it was</p> <p>23 a guy that was in one of those meetings. I had seen the</p> <p>24 guy before. So he was trusted. I had been in meetings</p> <p>25 where there was like 30 people in the room.</p>
<p style="text-align: right;">Page 418</p> <p>1 because when I went back in, they took the papers after</p> <p>2 I did meet with the lawyers.</p> <p>3 Q. You don't know who handed you that envelope?</p> <p>4 A. Yeah, it was a guy I never met before.</p> <p>5 Q. Where did he hand the papers to you at?</p> <p>6 A. In DC.</p> <p>7 Q. Where were you at?</p> <p>8 A. It was in DC.</p> <p>9 Q. Where were you at, sir?</p> <p>10 A. At some hotel in DC. We were meeting before I</p> <p>11 was going to the White House.</p> <p>12 Q. Was anybody with that gentleman before they</p> <p>13 handed you the papers?</p> <p>14 A. What's that?</p> <p>15 Q. Was anybody with the gentleman who handed you</p> <p>16 the papers that you knew?</p> <p>17 A. No. No. But I knew they were coming from this</p> <p>18 team of lawyers.</p> <p>19 Q. And what's the team of lawyers they were coming</p> <p>20 from?</p> <p>21 THE WITNESS: The team of lawyers I think</p> <p>22 would be attorney/client privilege, wouldn't it?</p> <p>23 MR. KACHOUROFF: Team of lawyers for who?</p> <p>24 I don't even know what we're talking -- who are we</p> <p>25 talking about?</p>	<p style="text-align: right;">Page 420</p> <p>1 Q. Let me just make sure I'm clear, Mr. Lindell.</p> <p>2 You're going to a meeting with the</p> <p>3 President that's a matter of national security, correct?</p> <p>4 A. That's with my evidence and the thing to sign</p> <p>5 from Dennis Montgomery.</p> <p>6 Q. And you're going to give him evidence that's</p> <p>7 contained in this sealed envelope, right, sir?</p> <p>8 A. No. No. No. Now you're mixing two -- two or</p> <p>9 three --</p> <p>10 Q. I'm not mixing anything. I'm trying to --</p> <p>11 A. A hundred percent.</p> <p>12 Q. -- ask questions and get information, sir.</p> <p>13 A. There was no evidence in that envelope. That's</p> <p>14 not true.</p> <p>15 Q. Okay. So --</p> <p>16 A. Here's what it was. I had my evidence, my four</p> <p>17 pieces of evidence, and I had a letter to sign that</p> <p>18 releases Dennis Montgomery so I can release the rest of</p> <p>19 it. That's what I talked to him about. All these</p> <p>20 people that voted that didn't -- didn't live in the</p> <p>21 states, I have the evidence now. It was brought to me.</p> <p>22 The guy's name is Dennis Montgomery. It's called Hammer</p> <p>23 and Scorecard. They brought up John Ratcliffe. I said</p> <p>24 John Ratcliffe actually said it on the 7th.</p> <p>25 It was an afterthought. I said, and by the</p>

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<p style="text-align: right;">Page 421</p> <p>1 way, these are recommendations from a team of lawyers.</p> <p>2 And I gave him that. And he opened it up, and it was --</p> <p>3 he read the first thing and the first thing only. The</p> <p>4 first recommendation was fire Robert O'Brien, who was</p> <p>5 sitting right here and -- and he was the director of</p> <p>6 national security.</p> <p>7 He never read the rest of them. He folded</p> <p>8 it up. He said the first one says to fire you. And</p> <p>9 I -- and he folded it up, the President did, gave it to</p> <p>10 John -- Robert O'Brien and said take Mike upstairs to</p> <p>11 the lawyers to see if there's anything to this evidence</p> <p>12 and then I can -- if I could sign the Dennis Montgomery</p> <p>13 maybe or in this envelope -- he was mostly take the</p> <p>14 evidence, because that's what we had talked about for</p> <p>15 15 minutes.</p> <p>16 Q. And then they turned you away, Mr. Lindell,</p> <p>17 correct?</p> <p>18 A. What's that?</p> <p>19 Q. They turned you away, the White House?</p> <p>20 A. No. They -- finish the story. Went upstairs.</p> <p>21 He opened it, brought me back downstairs, said, no, you</p> <p>22 can't -- they won't have time to see you for two hours,</p> <p>23 and I said I'll wait.</p> <p>24 That's when I went outside because I didn't</p> <p>25 have those papers back. I still haven't read them,</p>	<p style="text-align: right;">Page 423</p> <p>1 Q. Mr. Lindell --</p> <p>2 A. I sat and talked to them for over an hour about</p> <p>3 these things.</p> <p>4 Q. Mr. Lindell, do you remember what my question</p> <p>5 was?</p> <p>6 A. You said did they turn me away. They --</p> <p>7 they -- they didn't turn me away. They went through all</p> <p>8 the evidence. I laid it out for them, and I said we</p> <p>9 need to get this signed.</p> <p>10 They both got up and said, okay, we're</p> <p>11 going to look into this and we're going to get back to</p> <p>12 you.</p> <p>13 Q. Okay.</p> <p>14 A. They did say that.</p> <p>15 Q. Now --</p> <p>16 A. We'll get back to you on this.</p> <p>17 I said this is a matter of national</p> <p>18 security. What do you mean you're going to get back to</p> <p>19 me? I said when? Tomorrow? It was like the 15th of</p> <p>20 January.</p> <p>21 And then -- then they did -- brought me</p> <p>22 back downstairs, and then she came back down ten minutes</p> <p>23 later --</p> <p>24 THE COURT REPORTER: Can you please slow</p> <p>25 down?</p>
<p style="text-align: right;">Page 422</p> <p>1 never read them to this day. They took the picture</p> <p>2 of -- the media came over the hill. I said would y'all</p> <p>3 like me to answer questions? They go -- and I said --</p> <p>4 and they went, yeah. Yeah. Yeah.</p> <p>5 And I said I changed my mind. Y'all find</p> <p>6 something really good to write about me.</p> <p>7 Came back in. The lady had come down from</p> <p>8 upstairs. Not even ten minutes had passed. Brought me</p> <p>9 back upstairs to the lawyer, and that lawyer that was in</p> <p>10 there -- one of the recommendations on there was to fire</p> <p>11 him and he said this says to fire me.</p> <p>12 And I said I don't care what that says. I</p> <p>13 didn't write that. That's from lawyers.</p> <p>14 And I said -- and he goes, Mike, I read --</p> <p>15 my son read your book, and he got -- he all calmed down.</p> <p>16 I said I haven't read that thing.</p> <p>17 And he goes my son read your book.</p> <p>18 I said, well, maybe you should read my</p> <p>19 book.</p> <p>20 And he goes, well, Mike, this is so-and-so</p> <p>21 and so-and-so. I see you've got a matter of national</p> <p>22 security of evidence.</p> <p>23 And I said, yes, we need this thing signed.</p> <p>24 This guy worked for the CIA. He has all this evidence,</p> <p>25 and he needs it signed.</p>	<p style="text-align: right;">Page 424</p> <p>1 A. She came back down ten minutes later and said</p> <p>2 you do have to leave. We're not going to have to time.</p> <p>3 I said, well, he said he wanted to see me</p> <p>4 again. And they shooed me out without even asking him.</p> <p>5 Q. (BY MS. WRIGLEY) In terms of these papers that</p> <p>6 you were given by a group of lawyers to give to the</p> <p>7 President --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- who are the group of lawyers that gave you</p> <p>10 these papers, sir?</p> <p>11 A. It was -- it was -- I don't know. I don't</p> <p>12 know. I do not know.</p> <p>13 Q. And so --</p> <p>14 A. Probably from Patrick Byrne's group. That's as</p> <p>15 much as I can remember. It was an envelope. It was</p> <p>16 like a delivery, here, we have a recommendation. You</p> <p>17 have Patrick Byrnes, you have --</p> <p>18 Q. And you have no idea what's in this envelope</p> <p>19 that you're going to give to the President of the United</p> <p>20 States?</p> <p>21 A. They said it was just recommendations to the</p> <p>22 President. I had been in meetings with all these guys,</p> <p>23 all these -- Patrick Byrnes and your Sidney Powells and</p> <p>24 all these people, and they -- if they have their</p> <p>25 recommendations, that's their recommendations.</p>

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<p style="text-align: right;">Page 425</p> <p>1 Q. Okay, sir. So let's go back to Exhibit 637, 2 this article from the Business Insider. 3 A. I went there for one purpose, my evidence. 4 MR. KACHOUROFF: Same hearsay, relevance 5 objections that I had before. 6 Q. (BY MS. WRIGLEY) Now, your evidence, you said 7 you had four pieces of evidence that you gave President 8 Trump about election fraud. 9 A. No. I showed him four -- four pieces that -- 10 it's massive. He has 32 terabytes of this. I said he 11 worked for the government. We need this signed. If you 12 sign this, all of this stuff can be released by the 13 government. And before he would sign it, he brought 14 me -- he said go upstairs to the lawyers and see what we 15 can do. 16 Q. And that was never signed with respect to 17 Dennis Montgomery, correct? 18 A. It wasn't signed because the lawyers shooed me 19 out before I got to go back in and meet him. 20 Q. And the evidences that you were presenting to 21 President Trump on January 15th was information from 22 Dennis Montgomery? 23 A. Hundred percent. 24 Q. And that is evidence that is proof that the 25 election was interfered with, correct?</p>	<p style="text-align: right;">Page 427</p> <p>1 Q. And then if you go to the next page it says, 2 "There are no indications that a foreign actor succeeded 3 in compromising or affecting the actual votes cast in 4 this election, Wolf said in a November 3rd press 5 conference." 6 Do you see that? 7 A. Uh-huh. Right. 8 Q. And then you say, "Lindell said his film would 9 prove there was 'a communist coup.'" 10 Do you see that? 11 A. Uh-huh. 12 Q. Okay. Now, in terms of this Business Insider 13 article, when Kim Rasmussen sent it to you, it's 14 something you would have reviewed? Rasmussen sent it to 15 you -- 16 A. Uh-huh. 17 Q. -- you would have looked at this article, sir? 18 A. Yeah. 19 Q. This Business Insider? 20 A. Yeah. 21 Q. And you would have been aware on February 5th, 22 2021 that at least in terms of this article, it was 23 indicating that election officials were saying there was 24 no evidence of widespread fraud, correct? You were 25 aware of that?</p>
<p style="text-align: right;">Page 426</p> <p>1 A. That's a hundred percent true. 2 Q. Okay. 3 A. And -- and by the way, Mark Meadows was in 4 there, and Mark Meadows said -- the President said does 5 John Ratcliffe know about this, and I said, well, I'm 6 sure he does because -- and he goes, yeah, you know, 7 Dennis Montgomery has brought up the Hammer and 8 Scorecard. Mark Meadows said that. 9 And I'm sure John Ratcliffe does because he 10 put out a statement on January 7th that China had 11 interfered, and I'm going, wow, this is going to be 12 great. Just sign this and we can release everything. 13 And the lawyers pushed me -- pushed me 14 away. Never got to me. To this day, I don't know if -- 15 if they even told him that I was still in the building. 16 Q. Now, looking at the Business Insider article, 17 637, I'd like to draw your attention to something on 18 Page 2. Do you see at the bottom where it says 19 "election officials," sir? 20 A. Yeah. 21 Q. It says, "Election officials and even Trump 22 officials such as Attorney General Bill Barr and acting 23 Secretary of Homeland Security Chad Wolf said there was 24 no evidence of widespread fraud." Do you see that? 25 A. Yeah.</p>	<p style="text-align: right;">Page 428</p> <p>1 A. Was I aware of election officials saying that? 2 Q. Yes. 3 A. They were saying -- people were saying that all 4 over the place. Bill Barr. You reiterated this before. 5 Q. Okay. 6 A. I had my evidence. It doesn't matter what 7 other people say. Are they covering something up? I 8 don't know why they were saying what they were saying. 9 It didn't matter to me. 10 Now, if I had been someone that didn't have 11 any evidence, I would say, well, why -- they told you 12 there wasn't, well, I think there was. I didn't think 13 there was. I knew there was because I have the 14 evidence. 15 Q. That was evidence from Dennis Montgomery, sir? 16 A. Huh? 17 Q. Evidence from Dennis Montgomery? 18 A. Evidence from -- and -- and evidence that -- 19 the fact evidence that all these people voted, that 20 crimes were committed in every county in the United 21 States, every single county because I have the voter 22 rolls, and I paid a lot of money to get a lot of them. 23 That is a crime. Nobody has ever been able 24 to say, Mike, you don't have any evidence because there 25 it is.</p>

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1 Q. Were you aware that Mary Fanning had written
2 articles about elections prior to 2020 being interfered
3 with --
4 A. No idea.
5 Q. -- with the use of Hammer and Scorecard?
6 A. No idea. What I know about Mary Fanning,
7 January 9th, two documentaries.
8 Q. Prior to working with Mary Fanning on the
9 "Absolute Proof" documentary, did you do anything to
10 read what she had published on her blog in the past?
11 A. No.
12 Q. And so did you think it was relevant at all to
13 review the type of subject matters that Mary Fanning had
14 published on her blog --
15 A. Yes.
16 Q. -- over the years?
17 A. No. It's like I said before, I don't care who
18 Mary Fanning is or what she is. I had hardcore evidence
19 of everybody voting in every state illegally, and Mary
20 Fanning had the answer, if it was true, of what this
21 Dennis Montgomery had.
22 I didn't carry about Mary Fanning. Then
23 Dennis Montgomery brings me the evidence. I don't care
24 what Dennis Montgomery's past is. I want to know is
25 this real, true or not, so I did my own due diligence

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1 and then I went all in.
2 Q. Now, you were getting information on the
3 election in November and December of 2020, correct?
4 A. By -- from -- a lot of it from myself.
5 90 percent of it from me.
6 Q. Okay. And you were doing research on your own,
7 Mr. Lindell?
8 A. Every single day from morning until night until
9 the day I went to -- to the second I went to bed.
10 Q. And -- and exactly where were you getting
11 information on the election prior to 2021 in doing your
12 research?
13 A. What do you mean prior to 2021?
14 Q. Yeah. Like where were you getting your
15 information, sir?
16 A. From the counties, from the states. Like you
17 say, the secretary of states. These voter -- I would go
18 and get voter rolls, voter rolls and buy voter rolls and
19 get -- you know, get the people -- the people that
20 voted, who voted, what they -- who they voted --
21 Q. And then what did you do --
22 A. In counties -- and by the way, in the counties.
23 I got a lot of information from CNN, by the way.
24 Counties where you see anomalies -- I'll give you an
25 example. Outside of Milwaukee, there's two counties. I

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1 went back in time, and traditionally, they're always
2 75 percent Republican, 75 percent. One of them wasn't
3 done counting on election day, and it was 25 percent
4 Republican.
5 Now, you -- and I looked back and see,
6 well, how many people moved out of there, was there a
7 big change? No. So that's an anomaly. That's a
8 deviation. Those are the things I looked for.
9 I wanted to make sense of the deviations,
10 and -- and we could go over -- I could sit and hear
11 hundreds of deviations. I spent every day going, gee,
12 why would -- or why would Pennsylvania have more votes
13 than voters? It's impossible. You have an election
14 with ten people, and the vote -- final vote is ten to --
15 ten to six. That doesn't make sense.
16 Q. Now, in late 2020, were you working with Sidney
17 Powell on the election?
18 A. Huh-uh. Huh-uh.
19 Q. In late 2020, were you working with Lyn Wood?
20 A. No, I wasn't working with anyone. It was
21 always myself.
22 Q. Did you get information from Sidney Powell in
23 late 2020?
24 A. Sidney Powell, I had one phone call with her.
25 In that -- in that call, they said -- this is early in

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1 November, and on that call, they were trying to raise
2 money for -- I believe it was for the Andrew County
3 thing for ASOG. That's where I actually putting money
4 in.
5 And I remember asking. I said can I talk
6 to this Sidney Paul. I know I met her one other time,
7 and I didn't know that I had met her three years prior
8 at a book show.
9 And what I said to her on the phone, I
10 said -- I said is there -- I said could this election --
11 is this election -- I said what I found so far, it
12 doesn't make sense. I said people voted that don't live
13 in the county.
14 And she goes -- and I said is something
15 going to happen?
16 She goes -- she goes, Mike, it's -- it's --
17 we -- we have enough stuff, not even counting the
18 machines but she -- and I said, well, then why do we
19 need money for the machines?
20 She said that's got to be addressed because
21 that's going to be a permanent thing that we have to
22 fix.
23 You asked about Lyn Wood, Lyn Wood was the
24 year before with the -- with the vaccine I had when
25 Anderson Cooper attacked me. Lyn Wood -- Lyn Wood

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<p style="text-align: right;">Page 433</p> <p>1 helped me out with CNN.</p> <p>2 Q. In late 2020, did you get any information on</p> <p>3 Hammer and Scorecard?</p> <p>4 A. Did I get any information? If I did, I don't</p> <p>5 remember. I didn't know what it was if I did.</p> <p>6 Q. In late 2020, did you get any information from</p> <p>7 Dennis Montgomery?</p> <p>8 A. No, not that I know of because I wouldn't -- I</p> <p>9 wouldn't have known anything about it.</p> <p>10 (Exhibit 638 marked.)</p> <p>11 Q. (BY MS. WRIGLEY) Okay. I'm going to hand to</p> <p>12 you Exhibit 638, sir. For the record, this is a text</p> <p>13 chain between yourself and Scott Baio. This one is</p> <p>14 Bates stamped DEF 047408. It's not the full text chain,</p> <p>15 which is very long. It's just an excerpt of it. It's</p> <p>16 Page 1 and Page 49.</p> <p>17 Mr. Lindell, do you see at the top this is</p> <p>18 a text between you and Scott Baio that starts on -- the</p> <p>19 text chain that starts on May 9th, 2018? Do you see</p> <p>20 that, sir?</p> <p>21 A. Uh-huh.</p> <p>22 Q. And Mr. Baio, I think you identified him</p> <p>23 earlier, he --</p> <p>24 A. Yeah.</p> <p>25 Q. -- used to be an actor and is a friend yours?</p>	<p style="text-align: right;">Page 435</p> <p>1 from the man on the moon.</p> <p>2 All this stuff here, Chris Krebs, Chris</p> <p>3 Miller, I don't know where this came from. It's</p> <p>4 probably a screenshot on -- on the website. I have no</p> <p>5 idea. I didn't know who McInerney was either until I</p> <p>6 met him at -- February 5th.</p> <p>7 Q. Now, below this you say, "Some confidential</p> <p>8 stuff to check out, Scott, thumbs up."</p> <p>9 Do you see that?</p> <p>10 A. Uh-huh.</p> <p>11 Q. And do you know why you would have identified</p> <p>12 this as some confidential stuff?</p> <p>13 A. I have no idea.</p> <p>14 Q. Now, this information that you gave him has a</p> <p>15 number of bullet points listed here. Do you see that,</p> <p>16 sir?</p> <p>17 A. Yeah.</p> <p>18 Q. It says, "Hammer and various cyber weapons were</p> <p>19 previously used by USA against other countries. Now the</p> <p>20 weapons are being deployed against us. Obama is behind</p> <p>21 everything."</p> <p>22 A. Uh-huh.</p> <p>23 Q. Do you see that bullet point?</p> <p>24 A. Uh-huh.</p> <p>25 Q. And looking at that bullet point, sir, do you</p>
<p style="text-align: right;">Page 434</p> <p>1 A. Right. Yeah.</p> <p>2 Q. I'm going to have you skip to the second page,</p> <p>3 which in this --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- produced text says Page 49. Do you see at</p> <p>6 the top there's a date November 30th, 2020?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Mr. Baio texted you, "Any more information?"</p> <p>9 Do you see that?</p> <p>10 A. Uh-huh.</p> <p>11 Q. And you wrote, "Yes. I can update you</p> <p>12 tomorrow. All great. Have faith."</p> <p>13 A. Uh-huh.</p> <p>14 Q. Do you see that, Mr. Lindell?</p> <p>15 A. Yeah.</p> <p>16 Q. And then you provided him some information in a</p> <p>17 big text here that says, "Here are some of the</p> <p>18 highlights from the McInerney statement that were</p> <p>19 especially important." Do you see that?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Where did you get this information from?</p> <p>22 A. It was probably off the Internet. I've</p> <p>23 never -- I have never -- I didn't know what Hammer and</p> <p>24 various cyber weapons -- I had no idea what they were,</p> <p>25 Hammer and Scorecard. I didn't know Dennis Montgomery</p>	<p style="text-align: right;">Page 436</p> <p>1 think that makes sense?</p> <p>2 A. Knowing now what I know about Hammer and</p> <p>3 Scorecard, it could be true.</p> <p>4 Q. Okay. And do you think Obama is behind</p> <p>5 everything, sir?</p> <p>6 A. I -- I didn't write this.</p> <p>7 Q. Okay. You did send it to Scott Baio, though,</p> <p>8 right?</p> <p>9 A. What's that?</p> <p>10 Q. You did send it to Mr. Baio on --</p> <p>11 A. Yeah. I don't know where it came from. This</p> <p>12 is just bullet points from -- it looks like it came from</p> <p>13 Mc -- General McInerney.</p> <p>14 Q. Well, and you said the McInerney statement. Do</p> <p>15 you know where that statement would have come from?</p> <p>16 A. I have no idea what it is.</p> <p>17 Q. And this is -- General McInerney is one of the</p> <p>18 generals --</p> <p>19 A. This was sent to me. I didn't write that. I</p> <p>20 didn't put -- I didn't type in, "Here are some of the</p> <p>21 highlights." I couldn't even make -- I couldn't even</p> <p>22 type that good with all those little bullet points.</p> <p>23 This was something that was sent to me that I forwarded</p> <p>24 to Scott.</p> <p>25 Q. Now, General Mc -- McInerney is one of the</p>

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<p style="text-align: right;">Page 437</p> <p>1 generals that you testified earlier was the -- the --</p> <p>2 A. Right.</p> <p>3 Q. -- sort of a validator of --</p> <p>4 (Crosstalk.)</p> <p>5 A. First time I ever met him --</p> <p>6 Q. (BY MS. WRIGLEY) Correct?</p> <p>7 A. -- I thought that I ever heard his name was in</p> <p>8 "Absolute Proof."</p> <p>9 Q. Okay.</p> <p>10 A. This here from McInerney, I had no idea he was</p> <p>11 a general. This -- this thing was sent to me by</p> <p>12 somebody. I have no idea who.</p> <p>13 Q. But you consider him to be a reliable source,</p> <p>14 correct?</p> <p>15 A. When I had heard he was a general on "Absolute</p> <p>16 Proof."</p> <p>17 Q. Okay. And as you sit here today --</p> <p>18 A. Back here, I didn't know any of these things</p> <p>19 here.</p> <p>20 Q. Now, if you look at the second bullet point, it</p> <p>21 says, "Creator of Hammer and Scorecard is Dennis</p> <p>22 Montgomery, former CIA analyst."</p> <p>23 A. Uh-huh.</p> <p>24 Q. Do you see that?</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 439</p> <p>1 election theft are analyzed, including vote count</p> <p>2 distributions caused by fraudulent electronic</p> <p>3 manipulation of targeted voting machines." Do you see</p> <p>4 that?</p> <p>5 A. Uh-huh.</p> <p>6 Q. That's information that --</p> <p>7 A. What's that?</p> <p>8 Q. -- you had seen in November of 2020?</p> <p>9 A. Yeah.</p> <p>10 Q. Now, the next bullet point says, "The fact that</p> <p>11 all five battleground states stopped counting at the</p> <p>12 same time 'demonstrates prior coordination by election</p> <p>13 officials in five battleground states.' Then they used</p> <p>14 Hammer and Scorecard, plus Dominion, to move Joe Biden</p> <p>15 into the lead. It is a mathematical impossibility the</p> <p>16 way the votes came in. An algorithm was used." Do you</p> <p>17 see that bullet point?</p> <p>18 A. Uh-huh.</p> <p>19 Q. Does that make sense, sir?</p> <p>20 A. What's that?</p> <p>21 Q. At the time you sent this to Scott Baio, did</p> <p>22 you think that that bullet point made sense?</p> <p>23 A. I don't remember sending this to Scott Baio,</p> <p>24 and I don't remember even reading this. Obviously, I</p> <p>25 sent -- resent it to him.</p>
<p style="text-align: right;">Page 438</p> <p>1 Q. It also says, "FOX flipped against America.</p> <p>2 Deep state coup coordinators recruited the entire U.S.</p> <p>3 media and Big Tech to defeat the Republic and overthrow</p> <p>4 the U.S. Constitution." Do you see that?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Does that make sense, sir?</p> <p>7 A. What's that?</p> <p>8 Q. Does that make sense that FOX --</p> <p>9 (Crosstalk.)</p> <p>10 A. I didn't write this. I didn't write this. I</p> <p>11 forwarded it to Scott.</p> <p>12 Q. (BY MS. WRIGLEY) Okay. At the time, did you</p> <p>13 think that this made sense?</p> <p>14 A. I don't know. I don't -- I -- do I think it</p> <p>15 made sense? I didn't understand half of it. I didn't</p> <p>16 know what Hammer and Scorecard was. I didn't know</p> <p>17 Dennis Montgomery. His name is spelled wrong, by the</p> <p>18 way on --</p> <p>19 Q. The next bullet point --</p> <p>20 A. Did I think FOX flipped against the country?</p> <p>21 Absolutely, because of a -- they did a couple of things</p> <p>22 that didn't make sense back then.</p> <p>23 Q. The next bullet point says, "The December 14th</p> <p>24 deadline doesn't matter. President Trump should not</p> <p>25 leave office until all the facts surrounding the</p>	<p style="text-align: right;">Page 440</p> <p>1 I didn't write this. Do I agree with all</p> <p>2 of it? Like the -- it was just battleground states, no.</p> <p>3 I knew something happened in every state. Every single</p> <p>4 state in every single county, not just five battleground</p> <p>5 states.</p> <p>6 It looks like it's from Sidney. "The 305</p> <p>7 Battalion military intelligence is 'Kraken.' They</p> <p>8 always said she used that word Kraken. If I had to</p> <p>9 guess, this was something that she put out. That's what</p> <p>10 I'm guessing.</p> <p>11 Q. And that -- that bullet point says, "The 30th</p> <p>12 [sic] Battalion military intelligence is 'Kraken,'</p> <p>13 right?</p> <p>14 A. I have no idea what that means, and I have no</p> <p>15 idea what Kraken is. I absolutely do not. I have no</p> <p>16 knowledge of that, but Sidney used that term, remember.</p> <p>17 If you had to tell me, I'd say go find the</p> <p>18 person that wrote this, I wouldn't even know where to</p> <p>19 begin. I would have you start with her just by that</p> <p>20 word Kraken.</p> <p>21 Q. Now, if you look down a couple of bullet</p> <p>22 points, do you see where it says, "Once caught, mid</p> <p>23 level treasonous actors will point fingers at Biden and</p> <p>24 Obama, saying they were ordered to carry out the</p> <p>25 treasonous acts"?</p>

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<p style="text-align: right;">Page 441</p> <p>1 Do you see that?</p> <p>2 A. Yeah. I don't know what that means.</p> <p>3 (Witness mumbling to himself.)</p> <p>4 THE COURT REPORTER: I'm sorry.</p> <p>5 A. I don't know what that one is.</p> <p>6 Q. (BY MS. WRIGLEY) Okay. Now, this is</p> <p>7 information that you sent to Mr. Baio in a text and --</p> <p>8 and you identified as highlights from the McInerney</p> <p>9 statement. Do you see that?</p> <p>10 A. No, I didn't put that there. Someone else</p> <p>11 wrote that. Someone text that to me. I did not type</p> <p>12 here are some highlights from McInerney. Because I</p> <p>13 would have said to Scott, McInerney is General</p> <p>14 McInerney, I guess. I didn't explain to Scott anything.</p> <p>15 I just forwarded this piece of paper.</p> <p>16 Q. When you got information about election fraud,</p> <p>17 whether it be in 2020 or 2021, Mr. Lindell, did you</p> <p>18 critically look at that information to see if it</p> <p>19 actually made sense?</p> <p>20 A. Absolutely.</p> <p>21 Q. And --</p> <p>22 A. A hundred percent I did.</p> <p>23 Q. And did you ever consider, in looking at</p> <p>24 information that you got about election fraud from --</p> <p>25 for the 2020 election, like whether or not it had a --</p>	<p style="text-align: right;">Page 443</p> <p>1 machines. It's exactly -- exactly what happened, and we</p> <p>2 don't have a choice.</p> <p>3 Q. I'm going to hand you another document, sir.</p> <p>4 This is going to be 639.</p> <p>5 (Exhibit 639 marked.)</p> <p>6 A. And to answer your question, nobody could ever</p> <p>7 tell me different. No one. You can sort of show me</p> <p>8 evidence the other way. Show me the cast vote records,</p> <p>9 that your machines were not computer manipulated. No,</p> <p>10 you won't. You won't open them.</p> <p>11 Q. (BY MS. WRIGLEY) Looking at this Exhibit 639,</p> <p>12 do you see that it's -- is an E-mail from Mary Fanning</p> <p>13 to yourself, subject, forward key points on</p> <p>14 January 10th, 2021, sir?</p> <p>15 A. Okay.</p> <p>16 Q. And then do you see that she attaches a key</p> <p>17 points document to her E-mail, sir?</p> <p>18 A. Uh-huh.</p> <p>19 Q. And just for the record, the attachment is --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- DEF 030860, and it is three pages.</p> <p>22 Did you review this key points document</p> <p>23 Mary Fanning sent you on January 10th, 2021?</p> <p>24 A. I don't know. Probably.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 442</p> <p>1 let me just say a tinge of conspiracy theory to it?</p> <p>2 A. No. Because I seen them with my own eyes. If</p> <p>3 I heard it from someone else and didn't see it with my</p> <p>4 own -- it all -- if I can, I'll explain this real slow</p> <p>5 for you.</p> <p>6 Q. I don't know if you mean that sarcastically.</p> <p>7 A. I've got Dennis Montgomery's evidence. Okay?</p> <p>8 I've got Dennis Montgomery's evidence. Then the next</p> <p>9 thing was Dr. Frank's evidence that validated. Then the</p> <p>10 next thing I got was hundreds of thousands of canvassers</p> <p>11 that went out like -- check like Florida. They</p> <p>12 canvassed 80 something thousand homes to see if</p> <p>13 people -- if they voted, what -- and -- and to -- you</p> <p>14 know what canvassing is, obviously.</p> <p>15 Q. Yes.</p> <p>16 A. Did that. That validated every -- that</p> <p>17 validated Dennis' information and Dr. Frank's. Then</p> <p>18 here comes along the cast vote records. All four of</p> <p>19 them, I say the same thing. When you have something,</p> <p>20 it's -- here, this is what it is. They can't show</p> <p>21 different numbers because they all have to be exactly</p> <p>22 the same.</p> <p>23 So one thing validated the next. All</p> <p>24 that's happened to me in the last three years, it</p> <p>25 validated that we've got to get rid of these voting</p>	<p style="text-align: right;">Page 444</p> <p>1 A. I'm sure I did because I wanted to know about</p> <p>2 Dennis Montgomery.</p> <p>3 Q. And she sent you a -- a list of bullet</p> <p>4 points --</p> <p>5 A. Uh-huh.</p> <p>6 Q. -- in this key points document, correct?</p> <p>7 A. Correct.</p> <p>8 Q. And the majority of these bullet points relate</p> <p>9 to either Dennis Montgomery or Hammer and Scorecard,</p> <p>10 correct?</p> <p>11 A. That is correct.</p> <p>12 Q. And the first one talks about Dennis Montgomery</p> <p>13 holding a TS/SCI security clearance, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. Now, when you looked at these bullet points,</p> <p>16 did you evaluate them to see if they made sense, sir?</p> <p>17 A. Absolutely. Right down the line. Even when</p> <p>18 you get down to Bill Binney, remember I mentioned him</p> <p>19 earlier, and Kirk Wiebe, validated. Up and down here.</p> <p>20 Louie Gohmert, I validated all that stuff.</p> <p>21 The -- John -- John Brennan and John -- or</p> <p>22 James Clapper, all the stuff that's in here, I either</p> <p>23 tried the best I could to validate it, besides at the</p> <p>24 same time validating his data, that it was real, that</p> <p>25 his data came from the 2020 election. That's what I had</p>

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<p style="text-align: right;">Page 445</p> <p>1 Conan Haynes doing and Todd Sanders.</p> <p>2 Q. I'm done with that, Mr. Lindell.</p> <p>3 A couple more questions. After you put out</p> <p>4 your documentaries, how did -- how were the sales for</p> <p>5 MyPillow?</p> <p>6 A. Terrible. They were going down. We lost</p> <p>7 every -- by then, we lost every -- we lost Costco right</p> <p>8 after that, which cost us -- Costco came after that, and</p> <p>9 I already -- I -- I already knew the more I talked about</p> <p>10 the election, the more -- the more I was going to get</p> <p>11 cancelled, and sure enough, Costco cancelled right after</p> <p>12 that movie, and that hurt us the most because Costco --</p> <p>13 Costco, that was a separate business and millions of</p> <p>14 dollars, and it involved 90 something people that never</p> <p>15 went home, and they directly cancelled because of that</p> <p>16 movie.</p> <p>17 (Exhibit 641 marked.)</p> <p>18 Q. (BY MS. WRIGLEY) Sir, I'm going to ask you to</p> <p>19 take a look at this exhibit which I've marked as --</p> <p>20 MS. WRIGLEY: What did I mark it as?</p> <p>21 MS. LOFTUS: 642.</p> <p>22 Q. (BY MS. WRIGLEY) 642, is that what the number</p> <p>23 says, sir?</p> <p>24 MS. LOFTUS: Is that right?</p> <p>25 MR. KACHOUROFF: The last one I have is</p>	<p style="text-align: right;">Page 447</p> <p>1 A. Okay.</p> <p>2 Q. If you go to the second page --</p> <p>3 A. Yeah.</p> <p>4 Q. -- do you see -- and this is from the January</p> <p>5 20th, 2021 text. At the top, Darren Lindell says, "Yo.</p> <p>6 I know you're super busy, but Jess and I are starting</p> <p>7 the wedding planning process and have some deposits we</p> <p>8 need to put down. Is it possible to get some of our</p> <p>9 wedding budget. Thanks. Almost 10K orders already</p> <p>10 today." Do you see that?</p> <p>11 A. Uh-huh.</p> <p>12 Q. You responded to him. Do you see that?</p> <p>13 A. Where -- where are --</p> <p>14 Q. You say, "No. I am a little short of cash,"</p> <p>15 with an Emoji. Do you see that?</p> <p>16 A. Yeah.</p> <p>17 Q. And then Darren Lindell says, "LOLOL, yeah,</p> <p>18 been a slow few days, Emoji, 38,000 orders yesterday</p> <p>19 shattered every record."</p> <p>20 A. Right.</p> <p>21 Q. And this is on January 20th, '21?</p> <p>22 A. That's correct.</p> <p>23 Q. And that was post --</p> <p>24 A. That was after the picture at the White House.</p> <p>25 Q. Yes. And just for the record, who is Darren</p>
<p style="text-align: right;">Page 446</p> <p>1 639.</p> <p>2 Q. (BY MS. WRIGLEY) Mr. Lindell, what is the</p> <p>3 number at the bottom right-hand corner from the sticker?</p> <p>4 A. 00 -- 641.</p> <p>5 Q. 641, yes.</p> <p>6 MS. WRIGLEY: Did you give Chris a copy?</p> <p>7 MR. KACHOUROFF: Did we miss 640?</p> <p>8 MS. WRIGLEY: I don't know.</p> <p>9 MR. KACHOUROFF: It's okay. I mean, I just</p> <p>10 want to --</p> <p>11 MS. WRIGLEY: I don't know. We'll</p> <p>12 straighten it up afterwards.</p> <p>13 Q. (BY MS. WRIGLEY) I'm looking at 641. Do you</p> <p>14 see that this is a text chain between yourself and</p> <p>15 Darryl -- Darren Lindell?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Okay. And do you see that the text chain</p> <p>18 starts on January 20th, 2021?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Now, this was produced as DEF 082635. It's an</p> <p>21 excerpt of Pages --</p> <p>22 A. Uh-huh.</p> <p>23 Q. -- 1, 2, 3, 4 and 35, 36, 37 and then also 47.</p> <p>24 I just want to ask you a couple of questions about this</p> <p>25 text chain.</p>	<p style="text-align: right;">Page 448</p> <p>1 Lindell, sir?</p> <p>2 A. He's my son.</p> <p>3 Q. And did he work for MyPillow at this time?</p> <p>4 A. He's COO.</p> <p>5 Q. Now, you responded, "46 million. Who said</p> <p>6 being crazy in the news isn't good"?</p> <p>7 A. Right.</p> <p>8 Q. Do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. And were you experiencing a high amount of</p> <p>11 orders at that time?</p> <p>12 A. For the direct. We have six facets to our</p> <p>13 company. That was offsetting all of our -- at that</p> <p>14 time, it didn't last long, but it offset. We had</p> <p>15 already lost by that time -- and my son was not happy --</p> <p>16 a hundred million dollars worth of box stores by the</p> <p>17 time we had that day at the White House.</p> <p>18 This was like him joking with me, okay, I</p> <p>19 guess we're making it up here. You know, you'd have to</p> <p>20 ask him, but he -- he wasn't happy with anything I was</p> <p>21 doing.</p> <p>22 Q. Okay. If I could have you turn to the page</p> <p>23 which has the number at the decimal point 37 on this</p> <p>24 excerpt. Are you there, sir?</p> <p>25 A. Which one?</p>

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<p style="text-align: right;">Page 449</p> <p>1 Q. It's 37 at the bottom.</p> <p>2 A. Uh-huh.</p> <p>3 Q. Are you there?</p> <p>4 A. Yep.</p> <p>5 Q. Do you see at the second date in the middle is</p> <p>6 June 21st, 2021? Do you see that?</p> <p>7 A. Yeah.</p> <p>8 Q. And Mr. -- you write, "Sounds good. Are you</p> <p>9 out there?"</p> <p>10 A. What how?</p> <p>11 Q. On the right, you write --</p> <p>12 A. Which one am I looking at? 37?</p> <p>13 Q. 37. June 21st, 2021.</p> <p>14 A. And where -- where am I looking at here?</p> <p>15 Q. On the right, you say, "Sounds good. Are you</p> <p>16 out there?"</p> <p>17 A. "Sounds good," yes.</p> <p>18 Q. Okay. And that's on June 21st, 2021, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. And you had done a number of the documentaries</p> <p>21 by then, right? You had done a number of the</p> <p>22 documentaries by then, correct?</p> <p>23 A. Yeah. They were -- they were done two months</p> <p>24 prior to that. I did a -- I did an event in Wisconsin,</p> <p>25 that's what I'm talking about here. I did an event in</p>	<p style="text-align: right;">Page 451</p> <p>1 November 24th, 2021?</p> <p>2 A. Yeah.</p> <p>3 Q. And a little bit down on the right -- actually,</p> <p>4 it's the next date on the 27th of November, do you see</p> <p>5 where you wrote in the text, "5.5 million a day"?</p> <p>6 A. Uh-huh.</p> <p>7 Q. And would that have been --</p> <p>8 MR. KACHOUROFF: Objection. That's not</p> <p>9 what it says.</p> <p>10 Q. (BY MS. WRIGLEY) Well, let me just ask you --</p> <p>11 MR. KACHOUROFF: The document speak for</p> <p>12 it -- yeah.</p> <p>13 Q. (BY MS. WRIGLEY) If you look at November 27th,</p> <p>14 2021, what did you text on that day, sir?</p> <p>15 A. It says, "Okay."</p> <p>16 "Put him in line."</p> <p>17 THE COURT REPORTER: I'm sorry.</p> <p>18 THE WITNESS: I'm just trying to read it.</p> <p>19 I'm not making a statement.</p> <p>20 A. "5.5 million dollar day." I don't know what</p> <p>21 that -- what that was.</p> <p>22 "Sent an attachment." I don't know what</p> <p>23 the attachment is.</p> <p>24 "What are you doing this morning?"</p> <p>25 Q. (BY MS. WRIGLEY) Would that have been</p>
<p style="text-align: right;">Page 450</p> <p>1 Wisconsin. It was called -- it was 18,000 people showed</p> <p>2 up. It was for our FrankSpeech for my new platform.</p> <p>3 Q. And then, Mr. Lindell, your son, Darren, said,</p> <p>4 "Call me when you can. We're going to have way too much</p> <p>5 foam soon. Need to make adjustments." Do you see that?</p> <p>6 A. Yeah. You're right. Because we're slowing</p> <p>7 down, he means we're going to have -- way too much foam</p> <p>8 means we're over buying. Our sales are starting to</p> <p>9 fatigue. You are correct, we have to make adjustments.</p> <p>10 You can't keep buying that much foam.</p> <p>11 Q. He says, "Also we should talk Supima and Corded</p> <p>12 offers when you have the chance." Do you see that?</p> <p>13 A. That's correct.</p> <p>14 Q. And then you responded to him on June 27th,</p> <p>15 2021 stating, "We did 2 million today. Biggest day</p> <p>16 since February 28th. The real president gave me a shout</p> <p>17 out." Do you see that?</p> <p>18 A. Yep.</p> <p>19 Q. Now, I want to have you go down to the next</p> <p>20 page, Page 47.</p> <p>21 A. What's that?</p> <p>22 Q. The next page, I think it's 47 in your</p> <p>23 document.</p> <p>24 A. Yeah.</p> <p>25 Q. And do you see in the middle there's a date</p>	<p style="text-align: right;">Page 452</p> <p>1 \$5.5 million of MyPillow product sales that day?</p> <p>2 A. No. That probably -- that probably had to be</p> <p>3 for the whole week.</p> <p>4 Q. And so --</p> <p>5 A. It could have been that day, but I don't know</p> <p>6 what day -- that would have been a special day.</p> <p>7 Q. You said "day," right?</p> <p>8 A. I -- I know I said "day." 11-27, that's our --</p> <p>9 usually -- well, that's usually -- you know what, that</p> <p>10 is our biggest day. That was -- I know what it was.</p> <p>11 That was Black Friday. That's why. Black Friday is</p> <p>12 always our biggest day of the year, or Cyber Monday.</p> <p>13 Q. Okay. And let me just ask you this: You</p> <p>14 continued to sell MyPillow products in 2021, correct?</p> <p>15 A. Uh-huh.</p> <p>16 Q. And in 2022, did you continue tell MyPillow</p> <p>17 products?</p> <p>18 A. Uh-huh.</p> <p>19 Q. And did MyPillow turn a profit in 2021, made</p> <p>20 money?</p> <p>21 A. It would -- 2020 was our biggest profit because</p> <p>22 of the Coronavirus. '21, it went down. '22, we lost</p> <p>23 money. And then '23, we lost millions.</p> <p>24 Q. Okay. So did you make any money -- well, let</p> <p>25 me ask you this: Did MyPillow turn a profit in 2023?</p>

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<p style="text-align: right;">Page 453</p> <p>1 A. No.</p> <p>2 Q. Okay. And in 2022, did MyPillow --</p> <p>3 A. No.</p> <p>4 Q. -- turn a profit?</p> <p>5 A. No.</p> <p>6 Q. In 2021, did MyPillow turn a profit?</p> <p>7 A. Now, it could have been because we were at a</p> <p>8 plateau, and because of being a Republican and losing</p> <p>9 all the box stores, our business (Oral noise).</p> <p>10 Q. Okay. Now, do you currently advertise MyPillow</p> <p>11 products in 2024?</p> <p>12 A. Yeah.</p> <p>13 Q. And where do you advertise MyPillow products?</p> <p>14 A. The same place we always did, podcasts and the</p> <p>15 places we lost, we lost all of our -- Costco, which was</p> <p>16 all the show people. We lost the shopping channels. We</p> <p>17 lost the box stores. All we have left is our print, TV</p> <p>18 and podcasts, which has been our -- kind of our mainstay</p> <p>19 since 2010.</p> <p>20 Q. Okay. And, sir, do you, on an annual basis,</p> <p>21 get dividends or money as an owner of MyPillow?</p> <p>22 A. No. Everybody gets -- if you have -- if you</p> <p>23 have a stock dividend, it's -- if you -- once -- we're</p> <p>24 an S corp -- or an LLC. So it's in our bylaws, you have</p> <p>25 to pay out to the people because it's a pass through</p>	<p style="text-align: right;">Page 455</p> <p>1 from MyPillow every year, correct?</p> <p>2 A. Uh-huh.</p> <p>3 Q. And some years, you would get an amount of</p> <p>4 money based on the profits of MyPillow as a -- as an</p> <p>5 owner or a shareholder of that company, correct?</p> <p>6 A. It's -- yes. Because if you don't, if you just</p> <p>7 keep the money in your bank, you still have to pay tax</p> <p>8 on that money.</p> <p>9 Q. Okay. And did you receive over \$20 million in</p> <p>10 the year 2020 from your shares or any dividend from</p> <p>11 MyPillow?</p> <p>12 A. I don't know how much I made in 2020.</p> <p>13 Q. Okay. Would you report that on your tax</p> <p>14 returns?</p> <p>15 A. Of course. It has to be. It's a pass through.</p> <p>16 You can't -- it's not a passive income. It -- it is</p> <p>17 real income. You have to report it.</p> <p>18 Q. Okay. And --</p> <p>19 A. Even if you don't get the cash, you have to</p> <p>20 report it.</p> <p>21 Q. And you personally file tax returns every year</p> <p>22 with the IRS, correct, sir?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay.</p> <p>25 A. I'm under the biggest audit in history right</p>
<p style="text-align: right;">Page 454</p> <p>1 income, so you have to pay out the highest</p> <p>2 stockholders -- enough to cover his taxes.</p> <p>3 So normally, we always got -- every --</p> <p>4 everybody in the company got stock -- stock div -- not</p> <p>5 dividends. I guess disbursements. You would have to</p> <p>6 disburse so they could -- they have to pay taxes on that</p> <p>7 if the company made money.</p> <p>8 Now, that stopped because of my election</p> <p>9 stuff. Every -- we've lost money every year since. No</p> <p>10 one has got a stock dividend since 2021, I believe,</p> <p>11 early '21.</p> <p>12 Q. Did you get a dividend for the year 2000, you</p> <p>13 personally from MyPillow?</p> <p>14 A. For what?</p> <p>15 Q. Did you personally get a dividend from MyPillow</p> <p>16 in the year 2000?</p> <p>17 A. 2000?</p> <p>18 Q. Or from the sales themselves?</p> <p>19 A. 2020 you mean?</p> <p>20 Q. Yeah, 2020. Thank you.</p> <p>21 A. Yeah. No, everybody did in the company. I</p> <p>22 get -- I don't get to take one. Everybody gets one.</p> <p>23 Everybody gets -- it's all equal. I don't get -- I</p> <p>24 don't get a bonus.</p> <p>25 Q. Okay. Let me ask you this: You get a salary</p>	<p style="text-align: right;">Page 456</p> <p>1 now, and that's why they put that \$6 million thing</p> <p>2 against my one piece of property I've got.</p> <p>3 Q. Now, let me ask you -- let me ask you this: In</p> <p>4 this case and some of the other cases where you're a</p> <p>5 defendant, you had previous representation that withdrew</p> <p>6 from those cases, correct?</p> <p>7 A. That did what?</p> <p>8 Q. That withdrew from those cases?</p> <p>9 MR. KACHOUROFF: She's talking about --</p> <p>10 she's talking about --</p> <p>11 A. Oh, the lawyers?</p> <p>12 Q. (BY MS. WRIGLEY) Yes.</p> <p>13 A. Yeah. The first lawyers, towards the spring</p> <p>14 of -- the fall of '21, I believe, and they -- we had two</p> <p>15 things. One -- MyPillow had one and they -- and I had</p> <p>16 one.</p> <p>17 These guys were blatantly overcharging.</p> <p>18 They were watching my shows and watching my shows. It</p> <p>19 was crazy. I don't even know where these firms came</p> <p>20 from. We got rid of them and consolidated to one firm,</p> <p>21 and that was the Andrew Parker firm.</p> <p>22 And they started -- they got up charging</p> <p>23 about a million to \$2 million a month, and last August,</p> <p>24 I said you guys, I can't afford to keep going with you.</p> <p>25 I'm out of money. I've spent every dime I have. I've</p>

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<p style="text-align: right;">Page 457</p> <p>1 sold my properties. I have nothing left.</p> <p>2 And they said, you know, well, we can't</p> <p>3 work for free.</p> <p>4 And I said, well, I'm going to have to move</p> <p>5 on. That's when I hired Chris. And those guys said</p> <p>6 we're owed one month --</p> <p>7 Q. Okay.</p> <p>8 A. -- which was \$2 million.</p> <p>9 Q. And, Mr. Lindell, do you have any plans to</p> <p>10 personally file for bankruptcy?</p> <p>11 A. No. I'm trying to avoid that.</p> <p>12 Q. Okay. And do you have assets, sir?</p> <p>13 A. What?</p> <p>14 Q. You have assets?</p> <p>15 A. No, I have no assets.</p> <p>16 Q. You don't?</p> <p>17 A. There's nothing left. They have a \$6.6</p> <p>18 million -- on my house that's worth 2 million, they have</p> <p>19 a lien on that for 5.7 million. That's their auditor I</p> <p>20 told you about. That's their lien. They're arguing</p> <p>21 about a deduction. They said, well, you can use the</p> <p>22 deduction in '23. I have a loss of millions of dollars</p> <p>23 in '23.</p> <p>24 Q. Okay. Let me --</p> <p>25 A. So there's no -- there's no assets left.</p>	<p style="text-align: right;">Page 459</p> <p>1 A. That's correct.</p> <p>2 Q. -- have an ownership on?</p> <p>3 And, you know, no personal property such as</p> <p>4 houses?</p> <p>5 A. I have a property that's got -- like I said,</p> <p>6 the IRS has a lien on it. They sold the building, I</p> <p>7 guess. No, that one is gone. I sold it and I</p> <p>8 liquidated that and had to use that cash to pay</p> <p>9 attorneys or something. There's a house my sister lives</p> <p>10 in, but she's -- I just hold the mortgage on it.</p> <p>11 Q. Any other properties that you own?</p> <p>12 A. No.</p> <p>13 Q. Okay. Do you own any warehouse buildings?</p> <p>14 A. No. Sold it.</p> <p>15 Q. Okay. Does MyPillow have any cash on hand?</p> <p>16 A. No. They're in the -- they're in the whole</p> <p>17 every day.</p> <p>18 Q. Okay. Do you have any plans to file -- for</p> <p>19 MyPillow to file for bankruptcy, sir?</p> <p>20 A. No. I -- no. We are -- we are going to get</p> <p>21 through this, and my employees are -- I've kept them</p> <p>22 employed. I've borrowed money. I've borrowed millions</p> <p>23 of dollars myself to keep them employed and to keep</p> <p>24 going.</p> <p>25 Q. And --</p>
<p style="text-align: right;">Page 458</p> <p>1 Q. You have no assets personally, Mike Lindell,</p> <p>2 you have no assets?</p> <p>3 A. Huh-uh. Huh-uh.</p> <p>4 Q. Okay.</p> <p>5 A. Nothing.</p> <p>6 Q. And do you currently make a salary from</p> <p>7 MyPillow?</p> <p>8 A. Uh-huh, and that's being garnished.</p> <p>9 Q. Okay.</p> <p>10 A. It's being garnished. I get I think 50 percent</p> <p>11 of that because it's being garnished by the government</p> <p>12 there, too.</p> <p>13 Q. Okay. Do you own any other companies besides</p> <p>14 MyPillow, sir?</p> <p>15 A. I have stock in FrankSpeech.</p> <p>16 Q. Okay. Any other companies?</p> <p>17 A. What?</p> <p>18 Q. Any other companies that you have ownership</p> <p>19 interest in?</p> <p>20 A. Just FrankSpeech, MyStore and MyPillow.</p> <p>21 Q. Okay. So you have an ownership interest in</p> <p>22 three companies, MyPillow, FrankSpeech and MyStore?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Okay. And that -- those are the only companies</p> <p>25 that you --</p>	<p style="text-align: right;">Page 460</p> <p>1 A. From -- and when I say "borrowed," borrowed</p> <p>2 from your merchant server at a very high interest rate,</p> <p>3 35 percent interest.</p> <p>4 Q. Are you -- how many employees does MyPillow</p> <p>5 have right now?</p> <p>6 A. I have no idea.</p> <p>7 Q. Okay.</p> <p>8 A. Hundreds.</p> <p>9 Q. Are you paying those employees' salaries?</p> <p>10 A. Salaries?</p> <p>11 Q. Yes.</p> <p>12 A. You mean like wages?</p> <p>13 Q. Yes.</p> <p>14 A. Yeah.</p> <p>15 Q. Okay.</p> <p>16 A. They don't work for free.</p> <p>17 Q. You've purchased product in order to make the</p> <p>18 items that you sell to the public, correct?</p> <p>19 A. Uh-huh.</p> <p>20 Q. And do you have inventory at MyPillow?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. And how much inventory do you have on</p> <p>23 hand?</p> <p>24 A. I -- I don't know. We probably owe more than</p> <p>25 what we have in inventory. What happened was last</p>

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<p style="text-align: right;">Page 461</p> <p>1 August when I announced the plan to secure our 2 elections, they did a \$22 million credit squish on 3 MyPillow. So it was like a run on a bank. 4 Everybody that we used to have 90-day 5 credit, now it's 20 days. If you don't do it, we're 6 not -- we're not bringing you product. So we became our 7 own bank. Nobody will borrow me money because of all 8 your lawsuits. Any other time, I could borrow millions 9 of dollars. No one will touch me to borrow. 10 Q. Now, when you say "lawsuits," Smartmatic just 11 has this one lawsuit against you, correct? 12 A. Yeah. Yeah. Well, Dominion and -- well, it's 13 two. When -- when they sued MyPillow, I mean, the 14 people -- you can't -- MyPillow can't go borrow money to 15 help itself because they're going, oh, you did -- you 16 know, you're -- you're borrowing money -- banks aren't 17 going to borrow that money. In fact, we got de-banked, 18 de-merchant server. American Express, I've never been 19 late a day in our lives. It's decimated. 20 They've attacked MyPillow, which did 21 absolutely nothing. These -- these poor employees. So 22 I'm do everything I can to keep their jobs. 23 And so I have no plans on declaring 24 bankruptcy. I'll just -- I'll keep doing whatever I can 25 and working day by day to get by, and we -- we -- we've</p>	<p style="text-align: right;">Page 463</p> <p>1 going machine-free, but they're all working -- they're 2 all working for nothing. They're -- they're all 3 volunteers. Cause America, they're vol -- some of 4 them -- some of them are still under -- on payroll, 5 but -- but not too many. 6 Q. Mr. Lindell, you're the best spokesperson for 7 your company, MyPillow, correct? 8 A. Uh-huh. 9 Q. And how much time do you spend in terms of 10 promoting and trying to sell the business of MyPillow 11 versus the time and energy that you're putting in on 12 these election fraud claims, sir? 13 A. From January 9th of '21 -- or let's see -- 14 November of '21 until last August, it was 18 hours a day 15 trying to get rid of the machines and go to paper 16 ballots. 17 Now, since August until now, since the 18 attack on MyPillow since I announced the plan, it's 19 18 hours a day on MyPillow. 18 hours a day. Every day 20 I wake up, I have to worry that my employees will have a 21 job. 22 Q. But prior to that, you chose to spend the time 23 on the election fraud as opposed to your business, 24 correct, sir? 25 A. Yes. Absolutely.</p>
<p style="text-align: right;">Page 462</p> <p>1 borrowed money to pay Paul between the vendors. A lot 2 of the vendors have said, you know -- they've said, 3 okay, if you can pay us here, and then you borrow money 4 here. So it's just been day by day. 5 Q. And are you still paying individuals like 6 General Flynn or Dennis Montgomery or these private 7 investigators -- 8 A. No. No. This is -- if you watch my -- 9 Q. -- to pursue your election fraud, sir? 10 A. If you watch my show -- and General Flynn was 11 three years ago. I don't pay General Flynn. They -- 12 this -- over here -- you have the lawsuits over here. 13 Then you have this over here, which I put probably 14 \$30 million into. This is where I spent all my money. 15 Anybody that needed help to secure our 16 elections, anything to -- lawsuits out there to change 17 laws to get things back the way they were, that's where 18 I spent all the money. That's where I ran out of money. 19 I couldn't pay Dennis Montgomery any more. I couldn't 20 pay all these cyber guys any more. 21 But I've got enough stuff. I've got enough 22 evidence if I ever need the evidence. I had a plan to 23 secure our elections, to get rid of -- and that's what 24 we're doing now. Just today we got Robin Vos recalled. 25 We have three more counties in South Dakota that are</p>	<p style="text-align: right;">Page 464</p> <p>1 Q. And that was a choice that you end up making, 2 right? 3 A. A hundred percent. And I -- and I burned 4 through money because I didn't care -- I don't have a 5 company -- if we don't save our country, we don't 6 have -- I don't have a company anyway. 7 Q. You chose to sue Smartmatic first, correct? 8 A. What's that? 9 Q. You chose to sue Smartmatic first, right, sir? 10 A. Yeah, my lawyers did. Talk to them. It was 11 their decision. 12 Q. But you had to give the sign-off, right? 13 A. What? 14 Q. You had to give the sign-off? 15 A. Yeah. Yeah. Smartmatic sued Fox News on 16 Jan -- February 4th, 2021. It changed -- it changed 17 everything. Those -- you know, yes. 18 Q. And do you still advertise on Fox News, sir? 19 A. Uh-huh. 20 Q. And you pay Fox News probably 20 plus million 21 dollars to advertise every year, correct? 22 A. It's a burden. Now we're paying them -- 23 it's -- it's down. The commercials that are working, 24 \$400,000 a week. 25 Q. And that's what you pay Fox News to advertise</p>

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<p style="text-align: right;">Page 465</p> <p>1 MyPillow products, correct?</p> <p>2 A. Right.</p> <p>3 Q. And so you can still advertise MyPillow on Fox</p> <p>4 News, correct?</p> <p>5 A. Yeah. What does that have to do with anything?</p> <p>6 Q. And you can still advertise on other media</p> <p>7 stations, correct?</p> <p>8 A. You can still advertise there, yes, but I can't</p> <p>9 go on there to talk about anything or to promote my</p> <p>10 company. I can advertise there, but you realize if the</p> <p>11 ad doesn't break even, we get to a point where right now</p> <p>12 this ad is fatiguing, when that -- when that dries up,</p> <p>13 if you don't have another product right behind that --</p> <p>14 that's where I'm at today. That ad is fatiguing. If I</p> <p>15 don't come up with something, we're done. We don't have</p> <p>16 a -- you know, you have to keep coming up with something</p> <p>17 because we lost all our other outlets.</p> <p>18 We had box stores. We have the biggest</p> <p>19 brand this country has ever seen. All the box stores,</p> <p>20 they're gone. They're not coming back.</p> <p>21 Do you know just an advertiser -- let me</p> <p>22 tell you how far this goes. An advertiser on</p> <p>23 FrankSpeech, we went to get this company. This just</p> <p>24 happened this week. They were going to come -- probably</p> <p>25 come and advertise lots of stuff --</p>	<p style="text-align: right;">Page 467</p> <p>1 Q. You're --</p> <p>2 A. What does that have to do with anything?</p> <p>3 Q. You're upset that Smartmatic filed a lawsuit --</p> <p>4 A. When Smart -- when Smartmatic --</p> <p>5 THE COURT REPORTER: I'm sorry. I can only</p> <p>6 take one at a time.</p> <p>7 Q. (BY MS. WRIGLEY) Are you upset because</p> <p>8 Smartmatic filed lawsuits against news organizations to</p> <p>9 protect its reputation, sir?</p> <p>10 A. No.</p> <p>11 Q. That's what you're mad about?</p> <p>12 A. I just didn't like -- I don't like the</p> <p>13 manifestation of lawfare, of what it's done to this</p> <p>14 country, you know.</p> <p>15 And we -- and instead of you guys opening</p> <p>16 up machines and saying we have nothing to hide -- you're</p> <p>17 not a privately held company. You work for the</p> <p>18 government. You work for us. You did not open them up.</p> <p>19 I'm very upset with all the machine companies. Open it</p> <p>20 up and say we have nothing to hide. There's nothing</p> <p>21 proprietary in there. It's a computer. Open it up and</p> <p>22 show us.</p> <p>23 If you have a bank error -- a bank</p> <p>24 statement that's in error, if I have computer problems</p> <p>25 at MyPillow, you bring an IT guy in, you look and see</p>
<p style="text-align: right;">Page 466</p> <p>1 THE COURT REPORTER: I'm sorry. Can you</p> <p>2 please slow down?</p> <p>3 A. -- not just having MyPillow. And here they --</p> <p>4 Chuck Norris, I'll just say it, he turns this thing</p> <p>5 down, advertising, because it was Mike Lindell, you</p> <p>6 know. No, I don't want to do it. It's Mike Lindell,</p> <p>7 you know.</p> <p>8 So they -- it's, you know -- they --</p> <p>9 they're not doing it because they're worried if they put</p> <p>10 anything in, is he going to be here tomorrow because</p> <p>11 he's -- he's out of money, he's been sued, he's going</p> <p>12 down. So nobody wants to borrow or have anything to do</p> <p>13 with that, so, you -- you know, we live -- we live on</p> <p>14 prayer.</p> <p>15 Q. (BY MS. WRIGLEY) And, Mr. -- Mr. Lindell, many</p> <p>16 of those big box stores decided not to sell MyPillow</p> <p>17 products before Smartmatic sued anybody, correct?</p> <p>18 A. Those box stores -- those box stores all</p> <p>19 decided about the same -- the biggest one was right</p> <p>20 after you guys, and that was Costco. Yeah.</p> <p>21 Q. And are you aware of any statements that</p> <p>22 Smartmatic has ever made publicly telling anybody not to</p> <p>23 buy MyPillow products?</p> <p>24 A. That's not what you're -- that's not what I'm</p> <p>25 upset with you guys about.</p>	<p style="text-align: right;">Page 468</p> <p>1 what the problem is.</p> <p>2 You know, all those -- 242 machines went</p> <p>3 down in 2022 in Arizona at the same time. Do you know</p> <p>4 the impossibility of that? It's impossible, if they're</p> <p>5 not connected on the Internet, for every one of them to</p> <p>6 have the exact same glitch at the same moment in time.</p> <p>7 Wrong. It's impossible.</p> <p>8 I have computers, hundreds of computers at</p> <p>9 MyPillow. These are things that are impossible unless</p> <p>10 someone is controlling it.</p> <p>11 I will tell you this, in -- in that -- I</p> <p>12 told you about that gal in Georgia that --</p> <p>13 THE COURT REPORTER: Can you please slow</p> <p>14 down?</p> <p>15 A. -- the gal in Georgia that got zero votes in</p> <p>16 her own precinct, Brad Raffensperger called that -- it</p> <p>17 was -- it was a programming error.</p> <p>18 Three counties over, another Democrat, nice</p> <p>19 gal, she got 4600 votes, but she wasn't on the ballot.</p> <p>20 She wasn't on the ballot. She went -- she had said she</p> <p>21 was running two months prior. All -- all the votes from</p> <p>22 her were taken from this other candidate so this poor</p> <p>23 candidate would win. They gave them back. And Brad</p> <p>24 Raffensperger, we went after his office, and he said it</p> <p>25 was a it was programming error.</p>

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1 Why are you programming our elections? And
 2 who wrote her name down to take those? She wasn't a
 3 write in. This is -- it's bizarre, these deviations
 4 across our country, but nobody will talk about them.
 5 You know, if you guys had nothing to hide,
 6 you would open up our machines and say, hey, quit saying
 7 this because we are -- we are right.
 8 No one's proved me wrong. Show me why all
 9 these people voted and committed crimes. Millions of
 10 people in all 50 states. If you can show me that, we
 11 don't -- and I would back off. No one could ever show
 12 me my evidence is wrong.
 13 It came out of your machines. It came
 14 right out of them. Here's people that voted that don't
 15 live in this county, my own county, my own city, my own
 16 state and my own country. Where did these names come
 17 from? Explain how all these people voted that were --
 18 that have deceased. Yeah, I can, because it was done
 19 with computers.
 20 Q. (BY MS. WRIGLEY) And, Mr. Lindell, do you want
 21 to put the voting machines out of business?
 22 A. I want to get rid of them as fast -- every
 23 single one of them in the world. You can't use -- you
 24 can't use computers in elections. It's too -- some
 25 things you have to do by hand.

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1 If there -- I've said this before. If
 2 you -- if there's a computer error or -- or a breach of
 3 security or a cyber attack on the United States and you
 4 go in and you hack credit cards and you hack in like the
 5 breach that time, it just comes down -- it's just a
 6 money loss, and insurance might cover stuff or you lose
 7 money like MyPillow did that time.
 8 But when you have it in an election -- if
 9 you have an election -- let's just say that there's --
 10 that it's just hacked or there's just a programming
 11 error, you risk your whole country because there's --
 12 nobody gets to look in there and validate you guys. No
 13 one gets to talk to Brazil. No one got to look inside
 14 there and say, hey, what -- you know, what -- what
 15 really happened here? This guy fresh out of prison won
 16 this election.
 17 Do you know how many countries outlawed the
 18 machines. You know, outlawed. They're outlawed in
 19 Germany, France, UK. I met with them all to come up
 20 with the best hand counting system in the world.
 21 Argentina said, hey, we can't have this any more.
 22 They've out -- they've outlawed early
 23 voting all over the world, but the number one thing is
 24 we can't do computers. We have to just do it by hand,
 25 just like MyPillow, most of it is made by hand. Some

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1 things you can't do with machines or computers.
 2 MS. WRIGLEY: Move to --
 3 A. And certainly not something -- we've got to
 4 bring trust back, and to bring back that trust, we need
 5 paper ballots hand counted.
 6 MS. WRIGLEY: Move to strike as
 7 nonresponsive.
 8 Q. (BY MS. WRIGLEY) Mr. Lindell, are you looking
 9 to put Smartmatic out of business?
 10 A. Am I looking to put them out of business?
 11 Q. Yes.
 12 A. That's not my goal. My goal is -- I don't care
 13 what you guys do. I don't even care what your other
 14 businesses are. I'm telling you no machine company
 15 should be used. And just like I agree with the
 16 Democrats, Amy Klobuchar and Kamala Harris and everybody
 17 on Kill Chain and the Democrats, all the Democrat
 18 politicians, they want these machines gone in our
 19 elections. Gone.
 20 So whatever you do -- Smartmatic does with
 21 their other businesses, which I've read -- I'm been
 22 hearing about a lot of --
 23 THE COURT REPORTER: I'm sorry. Can you
 24 please slow down?
 25 A. -- hearing about a lot of corruption coming out

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1 of Florida and stuff that you guys did, the Philippines
 2 and all these other countries, but we'll see what
 3 happens there, you know. I just don't think you should
 4 have any kind of election ever done with a computer.
 5 MS. WRIGLEY: I'm going to move to strike
 6 as nonresponsive.
 7 Q. (BY MS. WRIGLEY) And let me ask it again.
 8 Do you want to put Smartmatic out of
 9 business, sir?
 10 A. Do I want to put Smartmatic out of business?
 11 MR. KACHOUROFF: Objection, asked and
 12 answered.
 13 A. I just -- I gave you my answer.
 14 Q. (BY MS. WRIGLEY) Is the answer yes?
 15 A. I don't -- Smartmatic can do anything but be
 16 involved in elections.
 17 Q. Okay.
 18 A. Be involved in anything. Go -- go make --
 19 well, you don't -- use your computers to make blenders.
 20 I don't know. Do whatever you want to do, but don't use
 21 them in elections.
 22 Q. And, sir, you don't care about putting
 23 employees that work at Smartmatic out of jobs, do you?
 24 A. You know, I feel bad for them that they're
 25 working for a company that has these devices that are

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<p style="text-align: right;">Page 473</p> <p>1 used to corrupt -- corrupt these -- the elections.</p> <p>2 Q. And you don't care about smearing Smartmatic's</p> <p>3 name either, correct?</p> <p>4 A. What's that?</p> <p>5 Q. You do not care about smearing Smartmatic's</p> <p>6 name, correct?</p> <p>7 A. I'm telling you -- you can say your name or</p> <p>8 whatever. You didn't care when Kamala Harris and Amy</p> <p>9 Klobuchar said in Kill Chain you guys control the</p> <p>10 elections.</p> <p>11 What I'm upset with you is why won't you</p> <p>12 show us? Instead of suing people, open up your machines</p> <p>13 and show me why I'm wrong. Show me why I'm wrong. I've</p> <p>14 got it up on my website. I've got the cast vote records</p> <p>15 from LA County. I've got evidence that you guys did</p> <p>16 what you did, but you don't -- you won't show it. Put</p> <p>17 it on the news. Put it to the jury, you know.</p> <p>18 Q. What's your -- what's your evidence from LA</p> <p>19 County, sir?</p> <p>20 A. From your county, we have not only the cast</p> <p>21 vote records -- I have Dennis Montgomery's, but we have</p> <p>22 the cast vote records. The cast votes record match</p> <p>23 exactly Mesa County. It's hundred percent computer</p> <p>24 manipulated in the 2020 election. 100 percent. Not</p> <p>25 98 percent.</p>	<p style="text-align: right;">Page 475</p> <p>1 target Smartmatic, correct?</p> <p>2 A. No. Only because that's your only county, so</p> <p>3 I've got to tell you that you're as guilty as the other</p> <p>4 machines. Every county -- every county in the country,</p> <p>5 3,143, it happened in every county.</p> <p>6 This is -- when we go to these officials in</p> <p>7 the county, if I came to your county official and say,</p> <p>8 hey, do you really want to keep the machines? Look at</p> <p>9 all the people that voted in this county that don't live</p> <p>10 here.</p> <p>11 You know what we did to validate that? We</p> <p>12 canvassed. We went door to door and found these names.</p> <p>13 And like nine people that voted in LA County -- I'll</p> <p>14 give an example. Down on -- whatever, pick a street.</p> <p>15 In LA County, nine people live at this house. You get</p> <p>16 there, and one person lives there, and eight of them</p> <p>17 don't live there. And you -- and you could dig deeper.</p> <p>18 Three of them are deceased and five of them live in</p> <p>19 another part of California.</p> <p>20 Q. Okay, sir. Thank you. Thank you for your time</p> <p>21 today.</p> <p>22 A. All right. Thank you.</p> <p>23 Q. I appreciate it, Mr. Lindell.</p> <p>24 A. Thanks. We got through it.</p> <p>25 MS. WRIGLEY: All right. Let's go off the</p>
<p style="text-align: right;">Page 474</p> <p>1 Anybody that looks at -- that's why anybody</p> <p>2 that sees this, anybody that's -- has any knowledge of</p> <p>3 cyber or computers looks at this and go, wow, it's</p> <p>4 identical. One is Dominion, one is Smartmatic. I don't</p> <p>5 know.</p> <p>6 Q. And you think that that -- the evidence that</p> <p>7 you're referring to makes sense, sir?</p> <p>8 A. Makes what?</p> <p>9 Q. Makes sense?</p> <p>10 A. Absolutely. All -- that's the only way you can</p> <p>11 explain every county and -- and in LA County, tens of --</p> <p>12 ten -- it's over 10,000 people voted that don't live in</p> <p>13 the county. You can't explain that. Can you explain</p> <p>14 that? Explain that to me. Do you think people went,</p> <p>15 hey, let's go vote in LA County and we don't live there.</p> <p>16 They voted in other places or their names were just</p> <p>17 pulled from the voter rolls.</p> <p>18 Q. You're -- you're identifying or picking on LA</p> <p>19 County because --</p> <p>20 A. No, I'm not. I'm just giving --</p> <p>21 THE COURT REPORTER: I can only take one at</p> <p>22 a time.</p> <p>23 THE WITNESS: Yeah.</p> <p>24 Q. (BY MS. WRIGLEY) You're identifying and</p> <p>25 picking on LA County because you're trying to attack and</p>	<p style="text-align: right;">Page 476</p> <p>1 record.</p> <p>2 THE WITNESS: I'm sure you guys will find</p> <p>3 other jobs when this is all over.</p> <p>4 THE VIDEOGRAPHER: Going off the record at</p> <p>5 5:56.</p> <p>6 (Whereupon, at 5:56 p.m.</p> <p>7 the deposition was concluded.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: MICHAEL JAMES LINDELL

3 DATE OF DEPOSITION: 6-11-2024

4 PAGE	LINE	CHANGE	REASON
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1 I, MICHAEL JAMES LINDELL, have read the foregoing

2 deposition and hereby affix my signature that same is

3 true and correct, except as noted above.

4

5 _____

6 MICHAEL JAMES LINDELL

7 THE STATE OF _____)

8 COUNTY OF _____)

9 Before me, _____, on this day

10 personally appeared MICHAEL JAMES LINDELL, known to me

11 (or proved to me under oath or through _____)

12 (description of identity card or other document) to be

13 the person whose name is subscribed to the foregoing

14 instrument and acknowledged to me that he executed the

15 same for the purposes and consideration therein

16 expressed.

17

18 Given under my hand and seal of office, this

19 _____ day of _____, _____.

20

21 _____

22 NOTARY PUBLIC IN AND FOR

23 THE STATE OF _____

24

25 My commission expires: _____

26 _____No Changes Made _____Amendment Sheet(s)

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MINNESOTA

3 SMARTMATIC USA CORP., *

4 SMARTMATIC *
INTERNATIONAL HOLDING *
B.V., AND SGO *
CORPORATION LIMITED *

5 VS. * CASE NO. 22-cv-0098-WMW-JFD

6 *
MICHAEL J. LINDELL *
AND MY PILLOW, INC. *

7

8 REPORTER'S CERTIFICATION OF THE ORAL
DEPOSITION OF MICHAEL JAMES LINDELL
6-11-2024

9

10 I, Edith A. Boggs, a Certified Shorthand

11 Reporter in and for the State of Texas, hereby certify

12 to the following:

13 That the witness, MICHAEL JAMES LINDELL, was

14 duly sworn by the officer and that the transcript of the

15 oral deposition is a true record of the testimony given

16 by the witness;

17 That the original deposition was delivered to

18 Nicole Wrigley, Esq.;

19 That a copy of this certificate was served on

20 all parties and/or the witness shown herein on

21 _____.

22 I further certify that pursuant to FRCP Rule

23 30(e)(2) that the signature of the deponent:

24 _____ was requested by the deponent or a party

25 before the completion of the deposition and that the

signature is to be before any notary public and returned

within 30 days from date of receipt of the transcript.

If returned, the attached Changes and Signature Page

contains any changes and the reasons therefore:

_____X_ was not requested by the deponent or a

party before the completion of the deposition.

I further certify that I am neither counsel

for, related to, nor employed by any of the parties or

attorneys in the action in which this proceeding was

taken, and further that I am not financially or

Page 480

1 otherwise interested in the outcome of the action.

2

3 Certified to by me on this, the 13th day of June,

4 2024.

5 *Edith A. Boggs*

6 Edith A. Boggs, CSR No. 3022

7 Firm Registration No. 03

8 Expiration Date: 7-31-2024

9 1235 North Loop West, Suite 510

10 Houston, Texas 77008

11 Ph. No.: (713) 524-4600

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MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
481

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1 COUNTY OF HARRIS)
2 STATE OF TEXAS)
3
4 I hereby certify that the witness was notified
5 on _____ that the witness has 30 days or
6 (____ days per agreement of counsel) after being
7 notified by the officer that the transcript is available
8 for review by the witness and if there are any changes
9 in the form or substance to be made, then the witness
10 shall sign a statement reciting such changes and the
11 reasons given by the witness for making them;
12 That the witness' signature was/was not
13 returned as of _____.
14 Subscribed and sworn to on this, the 13th day
15 of June, 2024.
16
17 Edith A. Boggs
18
19 Edith A. Boggs, CSR No. 3022
20 Firm Registration No. 03
21 Expiration Date: 7-31-2024
22 1235 North Loop West, Suite 510
23 Houston, Texas 77008
24 Ph. No.: (713) 524-4600
25